IN THE SENATE OF THE UNITED STATES
Sitting as a Court of Impeachment

In Re	)
	)
Impeachment of	)
President William Jefferson Clinton	)

Factual Record

Transcript of President's Civil Deposition at page 6, line 18, through page 11, line 22; pages 19 through 26; pages 48 through 85; and pages 203 through 205

The United States
House of Representatives

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IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE EASTERN DISTRICT OF ARKANSAS

WESTERN DIVISION

PAULA CORBIN JONES	)	
	)	
VS.	)	CIVIL ACTION NO.
	)	LR-C-94-290
WILLIAM JEFFERSON CLINTON	)	Judge Susan Webber Wright
and DANNY FERGUSON	)	

* * * * * *

VIDEOTAPED ORAL DEPOSITION OF

WILLIAM JEFFERSON CLINTON

* * * * * *

849-DC-00000351

January 17, 1998 Washington, D.C.

Denise K. McNamara, CSR, RPR, RMR

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18 What further confirms that, Your Honor, I
19 must say, as I was frankly bewildered that all six
20 lawyers from Mr. Campbell's firm would be here
21 today. I thought at a minimum it was overkill, but
22 then it became very clear to me, Your Honor, as I
23 looked at the papers this morning, and I'd like to
24 make this part of the record, each of these lawyers
25 with maybe one exception or two are scheduled to be

1 on, on a variety of shows tomorrow. Fox News Sunday
2 will have the pleasure of Mr. Holmes' presence. Mr.
3 Fisher will be on Face the Nation tomorrow, according
4 to this anyway. Sam and Cokie this week, the old
5 Brinkley show, will have the benefit of lead counsel,
6 Mr. Campbell, and I believe there was one or two
7 others.
8 Your Honor, the only interest the press has
9 on Sunday is what we're doing here today, and while
10 there can be some ambiguity about certain aspects of
11 the gag order, one thing is clear: this deposition
12 is gagged, is confidential. If they all go on this
13 show and don't talk about the deposition, I frankly
14 don't know what they're going to talk about. I have
15 been invited on each of these shows and more. I have
16 refused to go on them. I was troubled to see that
17 Mr. Carville, who was not a spokesman for us in any
18 manner, shape or form, was going on one show. I
19 specifically requested that he not. It is not my
20 intention to go on any of them. I reserve the right
21 if they do go on these shows to rebut in an
22 appropriate fashion. 849-DC-00000358
23 My only point in raising this, Your Honor,
24 is this just underscores the importance of Your Honor
25 keeping restraints and controls on this deposition.

1 Your Honor, other than that, I'll certainly let
2 counsel respond if they choose to, we're prepared to
3 have the President come in and testify.
4 MR. FISHER: I don't know that any response
5 is called for, Your Honor. I'm prepared to respond
6 to any questions you may have.
7 JUDGE WRIGHT: All right. Let me make the
8 ruling. The Court previously, on the record, that is
9 I believe last Monday, spent some time with counsel
10 and did set certain limits on this discovery
11 deposition, and those limits of course will remain.
12 The Plaintiff is entitled to conduct discovery in
13 accordance with Rule 26 and Rule 30 of the Federal
14 Rules of Evidence, excuse me, Federal Rules of Civil
15 Procedure, and the Court is present to facilitate the
16 conduct of this discovery. 849-DC-00000359
17 Certainly in a case like this, there is
18 immense public scrutiny and public interest. The
19 Court has been extremely concerned about the leaks to
20 the press concerning matters such as rulings that are
21 under seal. Some of this information is accurate, of
22 course, some is not accurate. I have repeatedly
23 warned counsel in this matter that should there be
24 any unauthorized breaches of the Court's Protective
25 Order and the Court can trace these breaches to a

1 source, that sanctions will be in order. This is a
2 civil case. Sanctions can be quite substantial in a
3 civil case.
4 The rules also permit me to issue
5 protective orders to keep discovery matters under
6 seal and to limit discovery should the matter be
7 embarrassing, and I have attempted to do that for
8 both sides in this case as well as for other
9 witnesses, and I will continue to make every effort
10 to do that. Unfortunately, the nature of this case
11 is such that people will be embarrassed. I have
12 never had a sexual harassment case where there was
13 not some embarrassment. I'm not here today to rule
14 on admissibility of evidence, so I doubt that there
15 will be any Rule 403 rulings today. This is
16 discovery, and the limits on discovery have
17 previously been set. I know that Plaintiff's counsel
18 wanted to make an objection to some of those limits,
19 and I certainly will permit that at the appropriate
20 time. It will be easier now to do now that I'm here
21 than it would be otherwise. 849-DC-00000360
22 Likewise, I'm sure Defense Counsel would
23 also like to make some objections and that can be
24 done on the record. I'm going to try to be as fair
25 as I can within the rules of discovery, and even

1 though I'm saying I'm not following the rules of
2 evidence, I have to look to the rules of evidence to
3 determine what might or might not be admissible, but
4 as long as it's reasonably calculated to lead to
5 admissible evidence, that will be standard.
6 Now with respect to all these TV programs
7 and news appearances, it concerns the Court
8 tremendously that following the deposition that
9 Plaintiff's Counsel are going to be on just about
10 every Sunday talk show. Certainly my order will be
11 and has been that if anyone reveals anything
12 whatsoever about this deposition, that it will be in
13 violation of the Protective Order. This includes the
14 questions that were asked, objections that were made,
15 the demeanor of the President, whether he did well,
16 whether he did poorly, how long it lasted, how many
17 people were present, anything whatsoever about the
18 quality of the deposition, how many videographers or
19 stenographers we had, and what we did with the
20 tapes. You may acknowledge that it took place, but
21 that is it. We've already tacitly acknowledged that
22 it's taking place.
23 The previous deposition we had of President
24 Clinton was in a criminal case. I'm fortunate in one
25 regard, even though I'd rather not be here, I have

849-DC-00000361

1 had the privilege of presiding at a deposition of
2 President Clinton at the White House, when was it,
3 the summer of 1996.
4 MR. WARD: July 7th, 1996.
5 JUDGE WRIGHT: And back then the Court
6 instructed everyone in the room, and we had a forest
7 of lawyers in the room, not to discuss this case or
8 the deposition in any form or fashion, and it worked,
9 but I was dealing with a different bunch. The
10 President was a witness, he was not a party. The
11 public interest in this matter is, was certainly not
12 at the height that the public interest is in this
13 matter, and therefore I caution all of you to adhere
14 to the Court's Protective Order and also to what I
15 have just said. 849-DC-00000362
16 It is clear to me that someone is leaking
17 information to people like Matt Grudge, and it
18 concerns me very much that this might jeopardize the
19 Plaintiff's and Defendants' right to a fair trial,
20 and I have said repeatedly that if the Court is not
21 able to select a fair jury, we will not try this
22 case. And if we don't go to trial because of the
23
24
25

1 A. Good morning.
2 Q. My name is Jim Fisher, sir, and I'm an
3 attorney from Dallas, Texas, and I represent the
4 Plaintiff, Paula Jones, in this case. Do you
5 understand who I am and who I'm representing today?
6 A. Yes.
7 Q. And do you understand, sir, that your
8 answers to my questions today are testimony that is
9 being given under oath?
10 A. Yes.
11 Q. And your testimony is subject to the
12 penalty of perjury; do you understand that, sir?
13 A. I do.
14 Q. Sir, I'd like to hand you what has been
15 marked Deposition Exhibit 1. So that the record is
16 clear today, and that we know that we are
17 communicating, this is a definition of a term that
18 will be used in the course of my questioning, and the
19 term is "sexual relations." I will inform the Court
20 that the wording of this definition is patterned
21 after Federal Rule of Evidence 413. Would you please
22 take whatever time you need to read this definition,
23 because when I use the term "sexual relations," this
24 is what I mean today. 849-DC-00000370
25 MR. BENNETT: Is there a copy for the

1 Court?
2 MR. FISHER: Would you pass that, please?
3 MR. BENNETT: Your Honor, as an
4 introductory matter, I think this could really lead
5 to confusion, and I think it's important that the
6 record be clear. For example, it says, the last
7 line, "contact means intentional touching, directly
8 or through clothing." I mean just for example, one
9 could have a completely innocent shake of the hand,
10 and I don't want this record to reflect -- I think
11 we're here today for Counsel for the Plaintiff to ask
12 the President what he knows about various things,
13 what he did, what he didn't do, but I, I have a real
14 problem with this definition which means all things
15 to all people in this particular context, Your
16 Honor. 849-DC-00000371
17 MR. BRISTOW: Your Honor, I think the
18 wording of that is extremely erroneous. What this,
19 what the deposing attorney should be looking at is
20 exactly what occurred, and he can ask the witness to
21 describe as exactly as possible what occurred, but to
22 use this as an antecedent to his questions, it would
23 put him in a position, if the President admitted
24 shaking hands with someone, then under this truncated
25 deposition -- or definition, he could say or somehow

1 construe that to mean that that involves some sort of
2 sexual relations, and I think it's very unfair.
3 Frankly I think it's a political trick, and I've told
4 you before how I feel about the political character
5 of what this lawsuit is about.
6 MR. FISHER: Your Honor, may I respond?
7 JUDGE WRIGHT: You may.
8 MR. FISHER: The purpose of this is to
9 avoid everything that they have expressed concern
10 about. It is to allow us to be discreet and to make
11 the record crystal clear. There is absolutely no way
12 that this could ever be construed to include a
13 shaking of the hand.
14 MR. BENNETT: Well, Mr. Fisher, let me
15 refer you to paragraph two. It says "contact between
16 any part of the person's body or an object and the
17 genitals or anus of another person."
18 What if the President patted me and said I
19 had to lose ten pounds off my bottom? I -- you could
20 be arguing that I had sexual relations with him.
21 Your Honor, this is going to lead to confusion. Why
22 don't they ask the President what he did, what he
23 didn't do, and then we can argue in Court later about
24 what it means.
25 JUDGE WRIGHT: All right, let me make a

849-DC-00000372

1 ruling on this. It appears that this really is not
2 the definition of contact under Rule 413 because Rule
3 413 deals with nonconsensual contact. This
4 definition would encompass contact that is
5 consensual, and of course the Court has ruled that
6 some consensual contact is relevant in this case, and
7 so let the record reflect that the Court disagrees
8 with counsel that this is not, about it being the
9 definition under Rule 413. It's not. It is more in
10 keeping with, however, the Court's previous rules,
11 but I certainly agree with the President's Counsel
12 that this, the definition number two is too
13 encompassing, it's too broad, and so is definition
14 number three. Definition number one encompasses
15 intent, and so that would be, but numbers two and
16 three is just, are just too broad.
17 MR. FISHER: All right, Your Honor.
18 JUDGE WRIGHT: And number one is not too
19 broad, however, so I'll let you use that definition
20 as long as we understand that that's not Rule 413,
21 it's just the rule that would apply in this case to
22 intentional sexual contact.
23 MR. FISHER: Yes, Your Honor, and had I
24 been allowed to develop this further, everyone would
25 have seen that Deposition Exhibit 2 is actually the

849-DC-00000373

1 definition of sexual assault or offensive sexual
2 assault, which is the term in Rule 413.
3 MR. BENNETT: Your Honor, I object to this
4 record being filled with these kinds of things. This
5 is going to leak. Why don't they ask -- they have
6 got the President of the United States in this room
7 for several hours. Why don't they ask him questions
8 about what happened or didn't happen?
9 JUDGE WRIGHT: I will permit him to refer to
10 definition number one, which encompasses knowing and
11 intentional sexual contact for the purpose of
12 arousing or gratifying sexual desire. I'll permit
13 that. Go ahead.
14 Q. All right, Mr. President, in light of the
15 Court's ruling, you may consider subparts two and
16 three of Deposition Exhibit 1 to be stricken, and so
17 when in my questions I use the term "sexual
18 relations," sir, I'm talking only about part one in
19 the definition of the body. Do you understand that,
20 sir?
849-DC-00000374
21 A. I do.
22 Q. I'm now handing you what has been marked
23 Deposition Exhibit 2. Please take whatever time you
24 need to read Deposition Exhibit 2.
25 MR. BENNETT: Your Honor, again, what I am

1 very worried about, Your Honor, is first of all,
2 this, this, this appears to be a -- I mean what I
3 don't want to do is have him being asked questions
4 and then we don't, we're all ships passing in the
5 night. They're thinking of one thing, he's thinking
6 of another. Are we talking criminal assault? I mean
7 this is not what a deposition is for, Your Honor. He
8 can ask the President, what did you do? He can ask
9 him specifically in certain instances what he did,
10 and isn't that what this deposition is for? It's not
11 to sort of lay a trap for him, and I'm going to
12 object to the President answering and having to
13 remember what's on this whole sheet of paper, and I
14 just don't think it's fair. It's going to lend to
15 confusion.
16 JUDGE WRIGHT: All right, do you agree with
17 Mr. Bennett?
18 MR. BRISTOW: I had one other point to add,
19 Your Honor.
20 JUDGE WRIGHT: All right.
21 MR. BRISTOW: This is almost like in a
22 typical automobile accident where the plaintiff's
23 counsel wants to ask the defendant were you
24 negligent. That's not factual.
25 JUDGE WRIGHT: Mr. Fisher, do you have a

849-DC-00000375

1 response?

2 MR. FISHER: Yes, Your Honor. What I'm

3 trying to do is avoid having to ask the President a

4 number of very salacious questions and to make this

5 as discreet as possible. This definition, I think

6 the Court will find, is taken directly from Rule 413,

7 which I believe President Clinton signed into law,

8 with the exception that I have narrowed subpart one

9 to a particular section, which would be covered by

10 Rule 413, and I have that section here to give the

11 President so that there is no question what is

12 intended. This will eliminate confusion, not cause

13 it.

14 MR. BENNETT: Your Honor, I have no

15 objection where the appropriate predicates are made

16 for them to ask the President, did you know X, yes or

17 no, what happened, what did you do, what didn't you

18 do. We are -- we acknowledge that some embarrassing

19 questions will be asked, but then we all will know

20 what we're talking about, but I do not want my client

21 answering questions not understanding exactly what

22 these folks are talking about. 849-DC-00000376

23 Now, Your Honor, I told you that the

24 President has a meeting at four o'clock, and we've

25 already wasted twenty minutes, and Mr. Fisher has yet

1 to ask his first factual question.
2 JUDGE WRIGHT: Well, I'm prepared to rule,
3 and I will not permit this definition to be
4 understood. Quite frankly there's several reasons.
5 One is that the Court heretofore has not proceeded
6 using these definitions. We have used, we've made
7 numerous rulings or the Court has made numerous
8 rulings in this case without specific reference to
9 these definitions, and so if you want to know the
10 truth, I don't know them very well. I would find it
11 difficult to make rulings, and Mr. Bennett has made
12 clear that he acknowledges that embarrassing
13 questions will be asked, and if this is in fact an
14 effort on, on the part of Plaintiff's Counsel to
15 avoid using sexual terms and avoid going into great
16 detail about what might or might not have occurred,
17 then there's no need to worry about that, you may go
18 into the detail.
19 MR. BENNETT: If the predicates are met, we
20 have no objection to the detail.
21 MR. FISHER: Thank you, Your Honor.
22 JUDGE WRIGHT: It's just going to make it
23 very difficult for me to rule, if you want to know
24 the truth, and I'm not sure Mr. Clinton knows all
25 these definitions, anyway.

1 major integral areas that you haven't gone into.
2 JUDGE WRIGHT: All right, Mr., Mr. Fisher,
3 state the question again. I just, I misunderstood
4 it, apparently.
5 MR. FISHER: The question, Your Honor, is
6 whether he ever came to the understanding that any of
7 these guidelines had changed.
8 JUDGE WRIGHT: Well, you may ask, go
9 ahead.
10 A. I don't think that question ever crossed my
11 mind one way or the other. I have no knowledge of,
12 that there has been any change in the federal law.
13 If there has been, if there hasn't been, I have no
14 knowledge of that.
15 Q. Now, do you know a woman named Monica
16 Lewinsky?
17 A. I do.
18 Q. How do you know her?
19 A. She worked in the White House for a while,
20 first as an intern, and then in, as the, in the
21 legislative affairs office.
22 Q. She began -- excuse me. 849-DC-00000399
23 A. So that's how I know her.
24 Q. Excuse me for interrupting you, sir. Did
25 she begin to work as an intern in the White House in

1 the summer of 1995?
2 A. I don't know when she started working at
3 the White House.
4 Q. Do you recall when you met her for the
5 first time?
6 A. It would be sometime, I'd think, in later
7 1995.
8 Q. She began to work in the White House office
9 of legislative affairs around December of 1995,
10 correct?
11 A. I have no idea.
12 Q. Do you know how she obtained that job?
13 A. No.
14 Q. Did you ever talk to anyone about finding a
15 job for Monica Lewinsky?
16 A. When she got the job in the legislative
17 affairs office? No.
18 Q. Before she got that job. 849-DC-00000400
19 A. No.
20 Q. Did you ever talk to anyone about the
21 possibility of her obtaining a job in the White
22 House?
23 A. She, she came there as an intern, and as
24 several of them have, she applied for some job there
25 apparently and got the job. I was not involved in

her moving from being an intern to being a full-time employee. I had no involvement in it whatever.

Q. And you never talked to anyone about that?

A. No, I did not.

Q. In April of 1996 she was offered and she accepted a job as assistant to the assistant secretary for public affairs at the U.S. Department of Defense; is that correct?

A. I don't know when she went over there.

Q. Is it correct that she did accept that job at some point?

A. I don't know what her specific job was. I know that she moved over to the Department of Defense.

Q. And worked at the Pentagon, correct?

A. Well, she worked for the Department of Defense. I think that's where all their offices are in Washington.

849-DC-00000401

Q. Is it true that when she worked at the White House she met with you several times?

A. I don't know about several times. There was a period when the, when the Republican Congress shut the government down that the whole White House was being run by interns, and she was assigned to work back in the Chief of Staff's office, and we were

1 all working there, and so I saw her on two or three
2 occasions then, and then when she worked at the White
3 House, I think there was one or two other times when
4 she brought some documents to me.
5 Q. Well, you also saw her at a number of
6 social functions at the White House, didn't you?
7 A. Could you be specific? I'm not sure. I
8 mean when we had, when we had like big staff things
9 for, if I had a, like in the summertime, if I had a
10 birthday party and the whole White House staff came,
11 then she must have been there. If we had a Christmas
12 party and the whole White House staff was invited,
13 she must have been there. I don't remember any
14 specific social occasions at the White House, but
15 people who work there when they're invited to these
16 things normally come. It's a -- they work long
17 hours, it's hard work, and it's one of the nice
18 things about being able to work there, so I assume
19 she was there, but I don't have any specific
20 recollection of any social events. 849-DC-00000402
21 JUDGE WRIGHT: I want to interrupt because
22 I want a break. I also wanted to ask about the
23 luncheon break. We're not, we're not too far from
24 twelve. I personally don't care when we take it, but
25 has Skadden lawyers arranged for lunch to be brought

1 up to us?
2 MR. BENNETT: I've arranged for lunch, Your
3 Honor. We can have it -- I don't know if it's there
4 right now. We were thinking twelve-thirty, but
5 whatever --
6 JUDGE WRIGHT: That's great. That's
7 perfect.
8 MR. BENNETT: And we have a room set aside
9 for you and your law clerk where you can eat
10 privately, and we have a separate room for their side
11 of the table, and our side.
12 JUDGE WRIGHT: All right, let's take a ten
13 minute break.
849-DC-00000403
14 (Short recess.)
15 JUDGE WRIGHT: All right, Mr. Fisher, you
16 may resume.
17 MR. FISHER: Thank you, Your Honor.
18 Q. Mr. President, before the break, we were
19 talking about Monica Lewinsky. At any time were you
20 and Monica Lewinsky together alone in the Oval
21 Office?
22 A. I don't recall, but as I said, when she
23 worked at the legislative affairs office, they always
24 had somebody there on the weekends. I typically
25 worked some on the weekends. Sometimes they'd bring

1 me things on the weekends. She -- it seems to me she
2 brought things to me once or twice on the weekends.
3 In that case, whatever time she would be in there,
4 drop it off, exchange a few words and go, she was
5 there. I don't have any specific recollections of
6 what the issues were, what was going on, but when the
7 Congress is there, we're working all the time, and
8 typically I would do some work on one of the days of
9 the weekends in the afternoon.
10 Q. So I understand, your testimony is that it
11 was possible, then, that you were alone with her, but
12 you have no specific recollection of that ever
13 happening?
14 A. Yes, that's correct. It's possible that
15 she, in, while she was working there, brought
16 something to me and that at the time she brought it
17 to me, she was the only person there. That's
18 possible.
19 Q. Did it ever happen that you and she went
20 down the hallway from the Oval Office to the private
21 kitchen? 849-DC-00000404
22 MR. BENNETT: Your Honor, excuse me, Mr.
23 President, I need some guidance from the Court at
24 this point. I'm going to object to the innuendo.
25 I'm afraid, as I say, that this will leak. I don't

1 question the predicates here. I question the good
2 faith of Counsel, the innuendo in the question.
3 Counsel is fully aware that Ms. Lewinsky has filed,
4 has an affidavit which they are in possession of
5 saying that there is absolutely no sex of any kind in
6 any manner, shape or form, with President Clinton,
7 and yet listening to the innuendo in the questions --
8 JUDGE WRIGHT: No, just a minute, let me
9 make my ruling. I do not know whether counsel is
10 basing this question on any affidavit, but I will
11 direct Mr. Bennett not to comment on other evidence
12 that might be pertinent and could be arguably
13 coaching the witness at this juncture. Now, I, Mr.
14 Fisher is an officer of this Court, and I have to
15 assume that he has a good faith basis for asking this
16 question. If in fact he has no good faith basis for
17 asking the question, he could later be sanctioned.
18 If you would like, I will be happy to review in
19 camera any good faith basis he might have.
20 MR. BENNETT: Well, Your Honor, with all
21 due respect, I would like to know the proffer. I'm
22 not coaching the witness. In preparation of the
23 witness for this deposition, the witness is fully
24 aware of Ms. Lewinsky's affidavit, so I have not told
25 him a single thing he doesn't know, but I think when

1 he asks questions like this where he's sitting on an
2 affidavit from the witness, he should at least have a
3 good faith proffer.
4 JUDGE WRIGHT: Now, I agree with you that
5 he needs to have a good faith basis for asking the
6 question.
7 MR. BENNETT: May we ask what it is, Your
8 Honor?
9 JUDGE WRIGHT: And I'm assuming that he
10 does, and I will be willing to review this in camera
11 if he does not want to reveal it to Counsel.
12 MR. BENNETT: Fine.
13 MR. FISHER: I would welcome an opportunity
14 to explain to the Court what our good faith basis is
15 in an in camera hearing.
16 JUDGE WRIGHT: All right.
17 MR. FISHER: I would prefer that we not
18 take the time to do that now, but I can tell the
19 Court I am very confident there is substantial
20 basis. 849-DC-00000406
21 JUDGE WRIGHT: All right, I'm going to
22 permit the question. He's an officer of the Court,
23 and as you know, Mr. Bennett, this Court has ruled on
24 prior occasions that a good faith basis can exist
25 notwithstanding the testimony of the witness, of the

1 deponent, and the other party.
2 MR. BENNETT: Yes, Your Honor, but you
3 understand, and I'm not arguing with you what my
4 concern is, Your Honor, I wouldn't have any trouble
5 with that if I knew that this deposition would be
6 kept under seal. But when he mentions names, when he
7 knows, or at least, you know, hearsay, hearsay,
8 hearsay about something, they check it out, they get
9 an affidavit from the woman, they ask these
10 questions, and the Washington Times will have her
11 name on the front page tomorrow or the day after.
12 JUDGE WRIGHT: As you know, I'm extremely
13 sympathetic with your position, however this is a
14 discovery deposition.
15 MR. BENNETT: I understand. That's all
16 right, Your Honor, I'm sorry.
17 JUDGE WRIGHT: Go ahead.
18 MR. FISHER: Thank you, Your Honor.
19 THE WITNESS: What was your question again,
20 sir?
21 MR. FISHER: I've forgotten, Mr. President,
22 I'm sorry.
23 JUDGE WRIGHT: Something about Ms. Lewinsky
24 in the hallway.
25 Q. Do you recall ever walking with Monica

849-DC-00000407

1 Lewinsky down the hallway from the Oval Office to
2 your private kitchen there in the White House?
3 A. Well, let me try to describe the facts
4 first, because you keep talking about this private
5 kitchen. The private kitchen is staffed by two naval
6 aides. They have total, unrestricted access to my
7 dining room, to that hallway, to coming into the Oval
8 Office. The people who are in the outer office of
9 the Oval Office can also enter at any time.
10 I was, after I went through a presidential
11 campaign in which the far right tried to convince the
12 American people I had committed murder, run drugs,
13 slept in my mother's bed with four prostitutes, and
14 done numerous other things, I had a high level of
15 paranoia. 849-DC-00000408
16 There are no curtains on the Oval Office,
17 there are no curtains on my private office, there are
18 no curtains or blinds that can close the windows in
19 my private dining room. The naval aides come and go
20 at will. There is a peephole on the office that
21 George Stephanopoulos first and then Rahm Emanuel
22 occupied that looks back down that corridor.
23 I have done everything I could to avoid the
24 kind of questions you are asking me here today, so to
25 talk about this kitchen as if it is a private

1 kitchen, it's a little cubbyhole, and these guys keep
2 the door open. They come and go at will. Now that's
3 the factual background here.
4 Now, to go back to your question, my
5 recollection is that, that at some point during the
6 government shutdown, when Ms. Lewinsky was still an
7 intern but was working the chief staff's office
8 because all the employees had to go home, that she
9 was back there with a pizza that she brought to me
10 and to others. I do not believe she was there alone,
11 however. I don't think she was. And my recollection
12 is that on a couple of occasions after that she was
13 there but my secretary, Betty Currie, was there with
14 her. She and Betty are friends. That's my, that's
15 my recollection. And I have no other recollection of
16 that.
17 MR. FISHER: While I appreciate all of that
18 information, for the record I'm going to object.
19 It's nonresponsive as to the entire answer up to the
20 point where the deponent, said, "Now back to your
21 question."
22 Q. At any time were you and Monica Lewinsky
23 alone in the hallway between the Oval Office and this
24 kitchen area?
25 A. I don't believe so, unless we were walking

1 back to the back dining room with the pizza. I just,
2 I don't remember. I don't believe we were alone in
3 the hallway, no.
4 Q. Are there doors at both ends of the
5 hallway?
6 A. They are, and they're always open.
7 Q. At any time have you and Monica Lewinsky
8 ever been alone together in any room in the White
9 House?
10 A. I think I testified to that earlier. I
11 think that there is a, it is -- I have no specific
12 recollection, but it seems to me that she was on duty
13 on a couple of occasions working for the legislative
14 affairs office and brought me some things to sign,
15 something on the weekend. That's -- I have a general
16 memory of that.
17 Q. Do you remember anything that was said in
18 any of those meetings?
19 A. No. You know, we just have conversation, I
20 don't remember.
21 Q. How long has Betty Currie been your
22 secretary?
23 A. Since I've been President.
24 Q. Did she also work with you in Arkansas?
25 A. Not when I was Governor. She worked in the

849-DC-00000410

1 transition. She worked for Warren Christopher in the
2 transition, and then she came to work for me.
3 Q. How is her work schedule arranged? Does
4 she have a certain shift that she works, or do you
5 ask her to work certain hours the following day?
6 Please explain how her schedule is determined.
7 A. She works, she comes to work early in the
8 morning and normally stays there until I leave at
9 night. She works very long hours, and then when I
10 come in on the weekend, or on Saturday, if I work on
11 Saturday, she's there, and normally if I'm, if I'm
12 working on Sunday and I'm having a schedule of
13 meetings, either she or Nancy Hernreich will be
14 there. One of them is always there on the weekend.
15 Sometimes if I come over just with paperwork and work
16 for a couple of hours, she's not there, but otherwise
17 she's always there when I'm there. 849-DC-00000411
18 Q. Are there any other individuals who are
19 specifically assigned to be your secretary?
20 A. No, just Betty. Betty and Nancy Hernreich
21 basically runs the outer office for me. They are my
22 two major assistants, and of course, and there are a
23 couple of other people who work with them, Janice
24 Kearney who keeps my, in effect, diary now of what's
25 going on, who's been -- she's been doing that maybe a

1 year or so, and a couple of other young women who
2 work with Nancy. But physically, outside my office,
3 there's Nancy and Betty.
4 Q. Now, Betty Currie and Monica Lewinsky are
5 friends, correct?
6 A. That's correct, they are friends.
7 Q. And how do you know they're friends?
8 A. Well, I know they're friends because,
9 because Betty befriended her when she was working
10 there, and I think Betty met her, my recollection is,
11 through, I think she was recommended for the
12 internship by a man named Walter Kaye who's a good
13 friend of mine and a good friend of our
14 administration, good friend of my family's, and Betty
15 and Walter were friends, and I think that's how it
16 happened. I think Betty just sort of adopted her,
17 you know. She's much younger than Betty, obviously.
18 I think Betty just took an interest in her and kind
19 of adopted her and has kept in touch with her over
20 the time since she left the White House.
21 Q. Monica would be about twenty-four years
22 old? 849-DC-00000412
23 A. I'm not sure exactly how old she is, but
24 she's a young woman.
25 Q. Now, to your knowledge, has Monica Lewinsky

1 ever sent any letters from the Pentagon to Betty
2 Currie in the White House?
3 A. I don't know. You'd have to ask Betty
4 about that. It wouldn't surprise me but you'd have
5 to ask her.
6 Q. Did Betty Currie ever bring to you a
7 personal message from Monica Lewinsky that had been
8 delivered to Betty?
9 A. On a couple of occasions, Christmas card,
10 birthday card, like that.
11 Q. Do you remember anything that was written
12 in any of those?
13 A. No. Sometimes, you know, just either small
14 talk or happy birthday or sometimes, you know, a
15 suggestion about how to get more young people
16 involved in some project I was working on. Nothing
17 remarkable. I don't remember anything particular
18 about it.
19 Q. Are those kept somewhere?
20 A. I don't think so.
21 Q. What did you do with them after you were
22 done with them?
23 A. I think I discarded them. I normally do.
24 People send me personal notes and stuff like that. I
25 just throw them away.

849-DC-00000413

1 Q. Why were they sent addressed to Betty
2 Currie instead of to you?
3 A. I have no idea if they were. I don't
4 know. I don't have any idea how, you know, I get a
5 lot of people send Betty things and Nancy things,
6 send other people things because they think there is
7 a higher chance that I'll get to see them. There are
8 any number of people who get letters that they are
9 then asked to deliver to me in the White House
10 because we get -- the volume of mail is so crushing,
11 they're afraid if, you know, they just send it I
12 won't see it, and in fact that sometimes happens. I
13 regret to say I've had a lot of friends, even on
14 occasions family members, say they sent me something
15 and I never saw it.
16 Q. Did you ever receive from Monica Lewinsky a
17 tape with a recorded message to you?
18 A. I don't believe so.
19 Q. Did you ever receive from Monica Lewinsky a
20 videotape?
21 A. No. What of? I'm almost positive I
22 didn't. 849-DC-00000414
23 Q. Did you ever receive from Monica
24 Lewinsky -- excuse me, strike that.
25 Did you ever receive from Betty Currie

1 either an audiotape or a videotape that you
2 understood had come from Monica Lewinsky?
3 A. I don't think so. I don't remember if I
4 did. You know, let me just, again, this is not
5 responsive, but it might help you in the questions
6 asked. On a periodic basis, Betty Currie will have
7 just books, neckties, things that people send that
8 get, that aggregate, accumulate. She said you want
9 these or shall I send them to the archives and stuff
10 like that, and I'll go over them, and she handles all
11 that, or someone does, and gives it to her, and so
12 normally when people send me things I don't see
13 them. You know, if there's some friend I meet along
14 the way in Chicago or someplace who hands me a tie or
15 hands me a book or something like that, maybe I would
16 see it. Otherwise I normally wouldn't see it unless
17 Betty or someone else, you know, just has it there.
18 Q. Well, if you don't see it, who makes the
19 decision whether to discard it versus sending it to
20 archives?
21 A. I have no idea. I don't know how it's
22 handled. 849-DC-00000415
23 Q. Has it ever happened to your knowledge that
24 Monica Lewinsky met with Betty Currie in the White
25 House between the hours of midnight and six a.m.?

1 A. I don't know.
2 Q. Have you ever met with Monica Lewinsky in
3 the White House between the hours of midnight and six
4 a.m.?
5 A. I certainly don't think so.
6 Q. Have you ever met --
7 A. Now, let me just say, when she was working
8 there, during, there may have been a time when we
9 were all -- we were up working late. There are lots
10 of, on any given night, when the Congress is in
11 session, there are always several people around until
12 late in the night, but I don't have any memory of
13 that. I just can't say that there could have been a
14 time when that occurred, I just -- but I don't
15 remember it.
16 Q. Certainly if it happened, nothing
17 remarkable would have occurred?
18 A. No, nothing remarkable. I don't remember
19 it.
20 Q. It would be extraordinary, wouldn't it, for
21 Betty Currie to be in the White House between
22 midnight and six a.m., wouldn't it?
23 A. I don't know what the facts were. I mean I
24 don't know. She's an extraordinary woman.
25 Q. Does that happen all the time, sir, or

849-DC-00000416

1 rarely?
2 A. Well, I don't know, because normally I'm
3 not there between midnight and six, so I wouldn't
4 know how many times she's there. Those are questions
5 you'd have to ask her. I just can't say.
6 Q. Has it ever happened that a White House
7 record was created that showed that Monica Lewinsky
8 was meeting with Betty Currie when in fact Monica
9 Lewinsky was meeting with you?
10 MR. BENNETT: No, Your Honor, I'm going to
11 certainly let the President answer that, but I object
12 to the form of the question because it assumes facts
13 not in evidence, and I again question their good
14 faith in this line of questioning.
15 JUDGE WRIGHT: I overrule the objection. I
16 will permit it. The nature of many of the responses
17 has been he doesn't recall or he doesn't know, and so
18 he has not outright denied it. This is discovery and
19 I'll permit the question. Go ahead.
20 A. Would you repeat the question?
21 Q. Yes, sir. Has it ever happened that a
22 White House record was created that reflected that
23 Betty Currie was meeting with Monica Lewinsky when in
24 fact you were meeting with Monica Lewinsky?
25 A. Not to my knowledge.

1 Q. Are there records created of your meetings
2 with people in the White House?
3 A. I believe we have a record of the people
4 that, that see me. We have -- I think there's a
5 record of everybody that comes in and out of the
6 White House. Of course the people who work there and
7 have permission to be there can come in and out and
8 move in and out of the offices, and I don't know if
9 there are records of all those meetings or not. For
10 example there are several of my staff people I see
11 many times a day, and I have no idea whether there's
12 a record of every time I see those people.
13 Q. All right, sir, and I appreciate that, but
14 just to be precise, I'm not just asking about records
15 of everyone coming into the White House, but I'm
16 asking specifically about records of meetings with
17 you. 849-DC-00000418
18 A. The answer to that is I don't know. I mean
19 I, Rahm Emanuel comes through that back door into the
20 kitchen and the hallway you talked about three or
21 four times a day, unannounced, unscheduled, sometimes
22 at night, sometimes in the daytime. I have no idea
23 if there's a record of every time he comes to see
24 me. I have no idea if there's a record of every time
25 John Podesta comes down the hall and sticks his head

1 in and talks to me about something. I simply don't
2 know. I don't know the answer to your question.
3 Q. You suspect, don't you, that there are at
4 least some meetings that you have for which there's
5 no written record made, correct?
6 A. I don't know the answer to that. They keep
7 a pretty good record of everything I do, I think.
8 Q. When was the last time you spoke with
9 Monica Lewinsky?
10 A. I'm trying to remember. Probably sometime
11 before Christmas. She came by to see Betty sometime
12 before Christmas. And she was there talking to her,
13 and I stuck my head out, said hello to her.
14 Q. Stuck your head out of the Oval Office?
15 A. Uh-huh, Betty said she was coming by and
16 talked to her, and I said hello to her.
17 Q. Was that shortly before Christmas or --
18 A. I'm sorry, I don't remember. Been sometime
19 in December, I think, and I believe -- that may not
20 be the last time. I think she came to one of the,
21 one of the Christmas parties.
22 Q. Did she tell you she had been served with a
23 subpoena in this case? 849-DC-00000419
24 A. No. I don't know if she had been.
25 Q. Did anyone other than your attorneys ever

1 tell you that Monica Lewinsky had been served with a
2 subpoena in this case?
3 A. I don't think so.
4 Q. Did you ever talk with Monica Lewinsky
5 about the possibility that she might be asked to
6 testify in this case?
7 A. Bruce Lindsey, I think Bruce Lindsey told
8 me that she was, I think maybe that's the first
9 person told me she was. I want to be as accurate as
10 I can.
11 MR. BENNETT: Keep your voice up, Mr.
12 President.
13 THE WITNESS: Okay.
14 A. But he may not have. I don't have a
15 specific memory, but I talked with him about the case
16 on more than one occasion, so he might have said
17 that.
18 Q. Did he tell you that on the phone or in
19 person?
20 A. I don't know. I talk to him and see him
21 several times a day, so I don't know. I would have
22 no way of remembering that.
23 Q. Did you talk to Mr. Lindsey about what
24 action, if any, should be taken as a result of her
25 being served with a subpoena? 849-DC-00000420

1 A. No.
2 Q. I believe I was starting to ask you a
3 question a moment ago and we got sidetracked. Have
4 you ever talked to Monica Lewinsky about the
5 possibility that she might be asked to testify in
6 this lawsuit?
7 A. I'm not sure, and let me tell you why I'm
8 not sure. It seems to me the, the, the -- I want to
9 be as accurate as I can here. Seems to me the last
10 time she was there to see Betty before Christmas we
11 were joking about how you-all, with the help of the
12 Rutherford Institute, were going to call every woman
13 I'd ever talked to, and I said, you know --
14 MR. BENNETT: We can't hear you, Mr.
15 President.
849-DC-00000421
16 A. And I said that you-all might call every
17 woman I ever talked to and ask them that, and so I
18 said you would qualify, or something like that. I
19 don't, I don't think we ever had more of a
20 conversation than that about it, but I might have
21 mentioned something to her about it, because when I
22 saw how long the witness list was, or I heard about
23 it, before I saw, but actually by the time I saw it
24 her name was on it, but I think that was after all
25 this had happened. I might have said something like

1 that, so I don't want to say for sure I didn't,
2 because I might have said something like that.
3 Q. Was anyone else present when you said
4 something like that?
5 A. Betty, Betty was present, for sure.
6 Somebody else might have been there, too, but I said
7 that to a lot of people. I mean that was just
8 something I said.
9 Q. What, if anything, did Monica Lewinsky say
10 in response?
11 A. Nothing that I remember. Whatever she
12 said, I don't remember. Probably just some
13 predictable thing.
14 Q. Recently you took a trip that included a
15 visit to Bosnia, correct?
16 A. That's correct.
17 Q. While you were on that trip, did you talk
18 to Monica Lewinsky?
19 A. I don't believe she was on that trip.
20 Q. Did you talk to her on the telephone?
21 A. No.
22 Q. While you were on that trip, did you ask
23 anyone to talk to her?
24 A. I don't believe so, no. Can you be more
25 specific? I don't have any idea. I don't think so,

849-DC-00000422

1 no.

2 Q. While you were on that trip, did you ask

3 anyone to meet with her?

4 A. Not to my knowledge.

5 Q. Excluding conversations that you may have

6 had with Mr. Bennett or any of your attorneys in this

7 case, within the past two weeks has anyone reported

8 to you that they had had a conversation with Monica

9 Lewinsky concerning this lawsuit?

10 A. I don't believe so. I'm sorry, I just

11 don't believe so.

12 Q. You know a man named Vernon Jordan?

13 A. I know him well.

14 Q. You've known him for a long time?

15 A. A long time. 849-DC-00000423

16 Q. Has it ever been reported to you that he

17 met with Monica Lewinsky and talked about this case?

18 A. I knew that he met with her. I think Betty

19 suggested that he meet with her. Anyway, he met with

20 her. I, I thought that he talked to her about

21 something else. I didn't know that -- I thought he

22 had given her some advice about her move to New

23 York. Seems like that's what Betty said.

24 Q. So Betty, Betty Currie suggested that

25 Vernon Jordan meet with Monica Lewinsky?

1 A. I don't know that.
2 Q. I thought you just said that. I'm sorry.
3 A. No, I think, I think, I think Betty told me
4 that Vernon talked to her, but I, my impression was
5 that Vernon was talking to her about her moving to
6 New York. I think that's what Betty said to me.
7 Q. What do you know about her moving to New
8 York?
9 A. Just that.
10 Q. Is she going to move to New York?
11 A. I don't know. She may have already moved
12 to New York. I don't know. My understanding was
13 that her mother moved to New York and that she was
14 going to move to New York and that she was looking
15 for some advice about what she should do when she got
16 there.
17 Q. Is it your understanding that she was
18 offered a job at the U.N.?
19 A. I know that she interviewed for one. I
20 don't know if she was offered one or not.
21 Q. Have you ever talked to Bill Richardson
22 about Monica Lewinsky?
23 A. No. 849-DC-00000424
24 Q. What is his title?
25 A. He's the Ambassador to the U.N.

1 JUDGE WRIGHT: I'm sorry, I didn't hear
2 that.
3 THE WITNESS: He's the Ambassador to the
4 U.N.
5 Q. Have you ever asked anyone to talk to Bill
6 Richardson about Monica Lewinsky?
7 A. I believe that, I believe that Monica, what
8 I know about that is I believe Monica asked Betty
9 Currie to ask someone to talk to him, and she, and
10 she talked to him and went to an interview with him.
11 That's what I believe happened.
12 Q. And the source of that information is who?
13 A. Betty. I think that's what Betty -- I
14 think Betty did that. I think Monica talked to Betty
15 about moving to New York, and I, my recollection is
16 that that was the chain of events.
17 Q. Did you say or do anything whatsoever to
18 create a possibility of Monica Lewinsky getting a job
19 at the U.N.?
849-DC-00000425
20 A. To my knowledge, no, although I must say I
21 wouldn't have thought there was anything wrong with
22 it. You know, she was a -- she had worked in the
23 White House, she had worked in the Defense
24 Department, and she was moving to New York. She was
25 a friend of Betty. I certainly wouldn't have been

1 opposed to it, based on anything I knew, anyway.
2 Q. Well, have you ever given any gifts to
3 Monica Lewinsky?
4 A. I don't recall. Do you know what they
5 were?
6 Q. A hat pin?
7 A. I don't, I don't remember. But I
8 certainly, I could have.
9 Q. A book about Walt Whitman?
10 A. I give -- let me just say, I give people a
11 lot of gifts, and when people are around I give a lot
12 of things I have at the White House away, so I could
13 have given her a gift, but I don't remember a
14 specific gift.
15 Q. Do you remember giving her a gold broach?
16 A. No.
17 Q. Do you remember giving her an item that had
18 been purchased from The Black Dog store at Martha's
19 Vineyard?
20 A. I do remember that, because when I went on
21 vacation, Betty said that, asked me if I was going to
22 bring some stuff back from The Black Dog, and she
23 said Monica loved, liked that stuff and would like to
24 have a a piece of it, and I did a lot of Christmas
25 shopping from The Black Dog, and I bought a lot of

849-DC-00000426

1 things for a lot of people, and I gave Betty a couple
2 of the pieces, and she gave I think something to
3 Monica and something to some of the other girls who
4 worked in the office. I remember that because Betty
5 mentioned it to me.
6 Q. What in particular was given to Monica?
7 A. I don't remember. I got a whole bag full
8 of things that I bought at The Black Dog. I went
9 there, they gave me some things, and I went and
10 purchased a lot at their store, and when I came back
11 I gave a, a big block of it to Betty, and I don't
12 know what she did with it all or who got what.
13 Q. But while you were in the store you did
14 pick out something for Monica, correct?
15 A. While I was in the store -- first of all,
16 The Black Dog sent me a selection of things. Then I
17 went to the store and I bought some other things,
18 t-shirts, sweatshirts, shirts. Then when I got back
19 home, I took out a thing or two that I wanted to
20 keep, and I took out a thing or two I wanted to give
21 to some other people, and I gave the rest of it to
22 Betty and she distributed it. That's what I remember
23 doing.
24 Q. Has Monica Lewinsky ever given you any
25 gifts?

1 A. Once or twice. I think she's given me a
2 book or two.
3 Q. Did she give you a silver cigar box?
4 A. No. 849-DC-00000428
5 Q. Did she give you a tie?
6 A. Yes, she has given me a tie before. I
7 believe that's right. Now, as I said, let me remind
8 you, normally when I get these ties, I get ties, you
9 know, together, and then they're given to me later,
10 but I believe that she has given me a tie.
11 Q. Well, Mr. President, it's my understanding
12 that Monica Lewinsky has made statements to people,
13 and I'd like for you --
14 MR. BRISTOW: Object, object to the form of
15 the question. Counsel shouldn't testify, and when
16 you start out like that, it's obviously counsel
17 testifying. I don't think that's proper.
18 MR. BENNETT: Let me add to that, Your
19 Honor wouldn't permit me to make reference to this
20 affidavit, and I respect your ruling.
21 JUDGE WRIGHT: Let me, let me just make my
22 ruling. It is not appropriate for Counsel to make
23 comments about, about these things. I don't know
24 whether he was trying to do this to establish a good
25 faith basis for the next question or not, but it is

1 inappropriate for counsel to comment, so I will
2 sustain the objection.
3 MR. FISHER: I understand.
4 Q. Did you have an extramarital sexual affair
5 with Monica Lewinsky?
6 A. No. 849-DC-00000429
7 Q. If she told someone that she had a sexual
8 affair with you beginning in November of 1995, would
9 that be a lie?
10 A. It's certainly not the truth. It would not
11 be the truth.
12 Q. I think I used the term "sexual affair."
13 And so the record is completely clear, have you ever
14 had sexual relations with Monica Lewinsky, as that
15 term is defined in Deposition Exhibit 1, as modified
16 by the Court?
17 MR. BENNETT: I object because I don't know
18 that he can remember --
19 JUDGE WRIGHT: Well, it's real short. He
20 can -- I will permit the question and you may show
21 the witness definition number one.
22 A. I have never had sexual relations with
23 Monica Lewinsky. I've never had an affair with her.
24 Q. Have you ever had a conversation with
25 Vernon Jordan in which Monica Lewinsky was

1 mentioned?
2 A. I have. He told me that he called -- he
3 mentioned in passing to me that he had talked to her,
4 and she had come to him for advice about moving to
5 New York.
6 Q. She had come to him for advice?
7 A. Uh-huh. She'd come to him for advice about
8 moving to New York. She had called him and asked if
9 she could come see him, and Betty I think had maybe
10 said something to him about talking to her, and he
11 had given her some advice about moving to New York.
12 That's all I know about that.
13 Q. Where were you when you had this
14 conversation with Vernon Jordan.
15 A. I don't have any idea. I talk to Vernon
16 Jordan a lot.
17 Q. Do you recall whether it was on the phone
18 or in person?
19 A. No.
20 Q. What did he say that she had said to him in
21 response?
22 A. He just said she seemed like a bright,
23 energetic young woman and she had certain interests,
24 and he made some suggestions to her and suggested
25 where she ought to go for interviews. That's all I

849-DC-00000430

1 know about that.
2 Q. Did you express any approval or disapproval
3 of anything Mr. Jordan had done?
4 MR. BENNETT: I object. I don't know what
5 that means, Your Honor. That's awfully vague and
6 ambiguous. Could you be more specific?
7 MR. FISHER: Sure.
8 Q. At the time you talked to Vernon Jordan
9 about his conversation with Monica Lewinsky
10 concerning her possible move to New York, did you
11 express any approval or disapproval?
12 A. I don't remember. I think he was just
13 reporting on the meeting to me. There'd be no reason
14 that I would have disapproved. I can't think of any
15 reason I would have disapproved it. She was a young
16 woman who'd worked in the White House and had gone to
17 work in the Defense Department and was moving to New
18 York. I would not have thought there was anything
19 wrong with that, with us trying to help her.
20 Q. Is it your testimony that you had nothing
21 whatsoever to do with causing that conversation to
22 take place between Monica Lewinsky and Vernon
23 Jordan? 849-DC-00000431
24 MR. BENNETT: I object. That, that
25 misstates the testimony.

1 MR. FISHER: I'm asking what his testimony
2 is.
3 MR. BENNETT: Anything to do, I think he's
4 testified, Your Honor. If he wants to ask more
5 questions, that's all right, but --
6 JUDGE WRIGHT: I will -- you might rephrase
7 the question and ask whether he ever intended to
8 facilitate the conversation or took any action to
9 help Ms. Lewinsky gain access to Vernon Jordan for
10 this purpose, or for any purpose. You might ask
11 that. The President has testified on this matter
12 that he doesn't think it would be improper if he had,
13 so go ahead, you can ask.
14 Q. Did you do anything, sir, to prompt this
15 conversation to take place between Vernon Jordan and
16 Monica Lewinsky? 849-DC-00000432
17 A. I can tell you what my memory is. My
18 memory is that Vernon said something to me about her
19 coming in, Betty had called and asked if he would see
20 her and he said she would, he said he would, and then
21 she called him and then he said something to me about
22 it. I'm sure if he said something to me about it I
23 said something positive about it. I wouldn't have
24 said anything negative about it. I didn't have any
25 negative knowledge. I mean there would be no reason

1 for me to be negative about it. Vernon liked to help
2 people. He was always trying to help people.
3 Q. My question, though, is focused on the time
4 before the conversation occurred, and the question is
5 whether you did anything to cause the conversation to
6 occur.
7 A. I think in the mean -- I'm not sure how you
8 mean the question. I think the way you mean the
9 question, the answer to that is no, I've already
10 testified. What my memory of this is, if you're
11 asking did I set the meeting up, I do not believe
12 that I did. I believe that Betty did that, and she
13 may have mentioned, asked me if I thought it was all
14 right if she did it, and if she did ask me I would
15 have said yes, and so if that happened, then I did
16 something to cause the conversation to occur. If
17 that's what you mean, yes. I didn't think there was
18 anything wrong with it. It seemed like a natural
19 thing to do to me. But I don't believe that I
20 actually was the precipitating force. I think that
21 she and Betty were close, and I think Betty did it.
22 That's my memory of it. 849-DC-00000433
23 Q. Have you ever had a conversation with
24 Vernon Jordan in which Paula Jones was mentioned?
25 A. I'm sure I have. I don't remember what it

1 would have been, but I'm sure I have. I mean after
2 all this time, I'm sure I have.
3 MR. BRISTOW: Your Honor, I just think we
4 should note for the record that it is now almost
5 twelve-thirty, and to my knowledge this is the first
6 moment in the deposition that the word "Paula Jones"
7 has been mentioned.
8 JUDGE WRIGHT: Are you suggesting we take a
9 break?
10 MR. BRISTOW: I think it's a good time for
11 a break, but I'm also thinking of the fact that we do
12 have some time constraints and -- but anyway, I just
13 thought it was an appropriate thing to note.
14 MR. BENNETT: Your Honor, I hope the
15 sandwiches are there, but I'm happy to break now, but
16 I'd like to get some guidance from the Court on
17 something. If at the completion of, as he has
18 apparently just completed Miss Lewinsky.
19 MR. FISHER: No, I haven't, but go ahead.
20 MR. BENNETT: Oh, I'm sorry, well, I'll
21 wait until you finish with Miss Lewinsky.
22 MR. FISHER: I have just a couple of other
23 things. 849-DC-00000434
24 MR. BENNETT: I can ask my generic
25 question. Hypothetically, Your Honor, if I have

1 affidavits of women that he's questioning the
2 President about and Your Honor does not want me to
3 emphasize that or even mention it for fear of the
4 witness, when they are, when he is finished at the
5 end of the day, may I read to the President certain
6 relevant portions of those affidavits that we have
7 and they have and ask the President if that's, as far
8 as he knows, a true and accurate statement?
9 JUDGE WRIGHT: You may, because this is
10 that type of deposition.
11 MR. BENNETT: Thank you.
12 JUDGE WRIGHT: And I realize that you want
13 to make your record because you're fearful about what
14 might take place.
15 MR. BENNETT: Thank you, Your Honor, thank
16 you, Your Honor.
17 JUDGE WRIGHT: Would you like to finish
18 these questions now before we break?
19 MR. FISHER: I have just a couple more on
20 this particular subject.
21 JUDGE WRIGHT: All right, all right, let's
22 proceed then.
23 Q. Mr. President, have you ever paid any money
24 to Monica Lewinsky?
25 A. No, sir.

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1 Q. Have you ever caused money to be paid to
2 her?
3 A. Absolutely not.
4 Q. Have you ever paid off any debt that she
5 owed to some other person?
6 A. No, sir.
7 Q. Have you ever caused a debt that she owed
8 to some other person to be repaid?
9 A. No, sir.
10 MR. FISHER: That's all I have on that
11 subject.
12 JUDGE WRIGHT: All right, how much time --
13 I'm suggesting we have lunch for, within the next
14 half hour and then come back here in half an hour.
15 MR. BENNETT: Would you like to break
16 now --
17 THE WITNESS: Mr. Fisher, is there
18 something, let me just -- you asked that with such
19 conviction and I answered with such conviction, is
20 there something you want to ask me about this? I
21 don't, I don't even know what you're talking about, I
22 don't think.
23 MR. FISHER: Sir, I think this will come to
24 light shortly, and you'll understand. 849-DC-00000436
25 MR. BENNETT: Your Honor, we've had an

1 functions held at the White House. When I worked as
2 an intern, he appeared at occasional functions
3 attended by me and several other interns. The
4 correspondence I drafted while I worked at the Office
5 of Legislative Affairs was seen and edited by
6 supervisors who either had the President's signature
7 affixed by mechanism or, I believe, had the President
8 sign the correspondence itself."
9 Is that an accurate and true statement, to
10 the best of your knowledge?
11 A. It's an accurate and true statement about
12 how the correspondence is handled in the
13 Congressional Affairs Division. I can't -- I know of
14 no reason why the rest of it's not accurate.
15 MR. FISHER: Your Honor, excuse me --
16 A. I don't know directly whether it's all
17 accurate.
18 MR. FISHER: Just wanted to make clear,
19 Your Honor, that since this is a discovery
20 deposition, that hearsay objections are reserved and
21 need not be made.
849-DC-00000554
22 MR. BENNETT: I agree with that.
23 JUDGE WRIGHT: Absolutely, and that's the
24 reason I was trying to say when I came back from
25 lunch that even though I'm permitting Mr. Bennett to

1 do this, if this is ever used at trial, the Rules of
2 Evidence would apply, and as stated before, the Rules
3 of Evidence don't apply in this discovery
4 deposition. Go ahead.
5 Q. In paragraph eight of her affidavit, she
6 says this, "I have never had a sexual relationship
7 with the President, he did not propose that we have a
8 sexual relationship, he did not offer me employment
9 or other benefits in exchange for a sexual
10 relationship, he did not deny me employment or other
11 benefits for rejecting a sexual relationship."
12 Is that a true and accurate statement as
13 far as you know it?
14 A. That is absolutely true.
15 Q. Do you recall, do you recall --
16 MR. BENNETT: Your Honor, may I have this
17 appended as an exhibit to this deposition, please?
18 MR. FISHER: No objection, Your Honor.
19 JUDGE WRIGHT: All right, it may be.
20 MR. BENNETT: All right.
21 Q. Now you're aware, are you not, of the
22 allegations against you by Paula Corbin Jones in this
23 lawsuit; is that correct?
24 A. Yes, sir, I am.
25 Q. Mr. President, did you ever make any sexual

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1 advances towards Paula Jones?
2 A. No, I did not.
3 Q. Did you ever expose yourself to Paula
4 Jones?
5 A. No, I did not.
6 Q. Did you ever ask Paula Jones to kiss your
7 penis?
8 A. No, I did not.
9 Q. Now, Mr. President, you've stated earlier
10 in your testimony that you do not recall with any
11 specificity the May 8th, 1991 conference at the
12 Excelsior; is that correct?
13 A. That's correct.
14 Q. If that is true, sir, how can you be sure
15 that you did not do these things which are alleged in
16 Ms. Jones' complaint?
17 A. Because, Mr. Bennett, in my lifetime I've
18 never sexually harassed a woman, and I've never done
19 what she accused me of doing. I didn't do it then,
20 because I never have, and I wouldn't.
21 Q. Mr. President, do you recall during your
22 direct examination Mr. Fisher asked you questions
23 about Beth Coulson?
24 A. Yes, I do.
25 Q. And you recall he asked you about being in

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