
Evelyn Lieberman, 1/30/98

Grand Jury

Page 1 to Page 89

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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Page 1

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

[3] In re:

[4] GRAND JURY PROCEEDINGS

[5] X
[6] Grand Jury Room No. 4
[7] United States District Court
[8] for the District of Columbia
[9] 3rd & Constitution, N.W.
[10] Washington, D.C. 20001
[11] Friday, January 30, 1998

[12] The testimony of EVELYN S. LIEBERMAN was taken in
[13] the presence of a full quorum of Grand Jury 97-2, impaneled
[14] on September 19, 1997, commencing at 1:52 p.m., before:

[15] SOLOMON WISENBERG
[16] MARY ANNE WIRTH
[17] PATRICK M. O'BRIEN
[18] DAVID BARGER
[19] STEPHEN BINHAK
[20] JULIE L. MYERS
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Page 5

[1] by the Independent Counsel Reauthorization Act of 1994
[2] whether Monica Lewinsky or others suborned perjury,
[3] obstructed justice, intimidated witnesses, or otherwise
[4] violated federal law, other than a Class B or a Class C
[5] misdemeanor or infraction, in dealing with a witnesses
[6] potential witnesses, attorneys or others concerning the
[7] civil case Jones versus Clinton."

[8] Did you understand what I just read?

[9] A Yes.

[10] Q I'm now going to read to you your rights and
[11] responsibilities as a witness before the Grand Jury, and
[12] occasionally, I will ask you to confirm that you've
[13] understood what I've said -- if you have. And if you
[14] haven't I'll try to do a better job.

[15] A All right.

[16] Q You have a privilege against self-incrimination.
[17] which means you may refuse to answer any question, if a
[18] truthful answer to the question would tend to incriminate
[19] you. Do you understand that?

[20] A Yes.

[21] Q Anything that you do say may be used against by the
[22] Grand Jury or in a subsequent legal proceeding. Do you
[23] understand that?

[24] A Yes.

[25] Q If you have retained counsel, you cannot have

Page 2

[1] [2] Whereupon,
[3] EVELYN S. LIEBERMAN
[4] was called as a witness and, after being first duly sworn by
[5] the Foreperson of the Grand Jury, was examined and testified
[6] as follows:

[7] EXAMINATION.

[8] THE WITNESS: This is pretty scary.

[9] BY MR. WISENBERG:

[10] Q Good afternoon. Would you state your name for the
[11] record, please.

[12] A My name is Evelyn S. Lieberman. May I know who all
[13] of you are, as well?

[14] Q Yes, ma'am.

[15] A Thank you.

[16] Q That's just what I was about to tell you.

[17] We are the -- my name is Sol Wisenberg with the
[18] Office of Independent Counsel, and these are my colleagues
[19] Mary Anne Wirth, Julie Myers, Steve Binhak, and in the far
[20] back of the room on the right, Pat O'Brien and David Barger.

[21] A Okay. Thank you.

[22] Q This is the court reporter, and these are the
[23] ladies and gentlemen of the Grand Jury (indicating).

[24] A Okay. Thank you.

[25] Q This is a federally-impaneled Grand Jury conducting

Page 6

[1] that counsel in with you while you're testifying, but the
[2] Grand Jury will permit you a reasonable opportunity to step
[3] outside the Grand Jury room to consult with counsel, if you
[4] so desire. Do you understand?

[5] A Yes.

[6] Q And I understand that you have counsel here today
[7] with you?

[8] A Yes.

[9] Q And his name is Mr. Both?

[10] A Charles Both, B-o-t-h.

[11] Q Okay. We are bound -- both myself and my

[12] colleagues, the grand jurors, and the court reporter -- by an
[13] oath of secrecy. Which means -- as a general matter, with
[14] certain recognized statutory exceptions -- we are not allowed
[15] to go out and blab what you testify to here today.

[16] There are exceptions to that. As an example, if
[17] there was ever a trial of anybody, let's say, as a result
[18] of this Grand Jury's proceedings, and you were to testify
[19] at trial differently than you do today, that would be an
[20] example where the Grand Jury secrecy could be breached. Do
[21] you understand?

[22] A Yes.

[23] Q And there are other examples. Certain federal
[24] agents are allowed to be on -- for instance, FBI agents are
[25] allowed to be on what we call the 6(e) list. They get to

Page 4

[1] an investigation of possible violations of federal criminal
[2] laws involving possible perjury, obstruction of justice, and
[3] subornation of perjury.

[4] A Am I permitted to have a pad -- to take notes?

[5] Q Let me -- I tell you what, let me confer for just a
[6] moment, please --

[7] A Okay.

[8] Q -- while I'm getting educated here. One moment.

[9] A That's fine.
[10] (Brief interruption to proceedings.)

[11] BY MR. WISENBERG:

[12] Q Ms. Lieberman, the advice I'm going to give you, or
[13] what I'm going to tell you is that you -- my understanding is
[14] that you cannot take notes --

[15] A Fine.

[16] Q -- but you can take notes outside, once you get
[17] outside. But the reason for that is that there's one
[18] official -- there has to be one official transcript.

[19] A Okay. So I shouldn't run out every 15 minutes and

[20] quick jot down everything you say. Okay.

[21] Q I'm going to read you now from a portion of

[22] the court order having to do with the authority of this
[23] Grand Jury:

[24] "The Independent Counsel shall have jurisdiction
[25] and authority to investigate to the maximum extent authorized

Page 7

[1] know about what goes on in the Grand Jury, but they can't
[2] blab it, either. Do you understand that?

[3] A Yes.

[4] Q In addition, there are special circumstances under
[5] which, with the appropriate court order, an independent
[6] counsel can release certain Grand Jury testimony. Do
[7] you understand that?

[8] A Yes.

[9] Q All right. There are different kinds of witnesses
[10] who appear before a Grand Jury. I'm going to read you from
[11] the Department of Justice manual what a target is:

[12] "A target is defined as a person as to whom the
[13] prosecutor or the Grand Jury has substantial evidence linking
[14] him or her to the commission of a crime and who, in the
[15] judgment of the prosecutor, is a putative defendant."

[16] Do you understand what I've just read to you?

[17] A Yes.

[18] Q You are not a target. Do you understand that?

[19] A Yes.

[20] Q A subject is defined as: A person whose conduct is
[21] within the scope of the Grand Jury's investigation -- anybody
[22] whose conduct of any kind is within the scope of Grand Jury's
[23] investigation. Do you understand that?

[24] A Yes.

[25] Q As you can probably tell from that definition, it's

Page 8

extremely broad and all-encompassing. And so, as a result of that, a more informal system has developed among prosecutors and some criminal defense attorneys which separates witnesses into targets -- under the definition I've just given you -- subjects, and witnesses, with witnesses, for want of a better term, being the least frightening designation.

Within that informal system, we would characterize you as a witness. Do you understand that?

A Yes.

Q However, it's important that you know that nobody -- no witness and no subject -- can be guaranteed that they will never be a target. Do you understand that?

A Yes.

Q We don't know how our investigation will develop. Do you understand that?

A Yes.

Q Now, if there's any question I ask that you are not clear on the meaning of, please ask me to rephrase, and I'll try to do a better job. Is that all right?

A All right. Yes.

Q You can't tell a lie, of course -- which is defined as an intentionally false statement about a material matter. Do you understand that?

A Yes.

Q That's perjury, and that's a crime. Do you

Page 11

for the court reporter.

A First name, Evelyn. E-v-e-l-y-n; middle initial, S; Lieberman, L-i-e-b-e-r-m-a-n.

Q And what is your current position. Ms. Lieberman?

A I'm director of the Voice of America.

Q I understand that you're from Long Beach, New York.

A That's correct.

Q And attended Long Beach High School.

A That's correct.

Q But that you lived in the District since 1971.

A Correct.

Q And that you attended Buffalo State University?

A Correct -- Buffalo State College, right.

Q And graduating in 1966.

A Yes.

Q And have also done graduate work at St. John's; is that correct.

A Correct.

Q And from 1966 to '71, you were a senior high English teacher at Hicksville High School on Long Island; is that correct?

A That's correct, until January '71.

Q All right. And then in '71, after you moved to D.C., worked at the science library in Georgetown; is that

Page 9

understand that?

A Yes.

Q Are you testifying here pursuant to a subpoena?

A Yes.

Q Did that subpoena ask you to bring any documents?

A No, I don't believe so.

Q Okay. Do you understand your rights and responsibilities as a Grand Jury witness, as I've read them to you?

A Yes.

Q Any questions that you have before we get started?

A No.

Q All right. And again, if you need to take a break, just for a drink of water --

A I just wish somebody would -- if you don't mind, I'd like someone to bring me some water. Thanks.

Q We'll do that before we start. How is that?

A Okay. Thanks.

Q We'll not start until you get some water.

A Are you the only questioner -- oh, I know, I know.

Never mind.

Q I'll be the primary questioner, and may be the only questioner.

A Right. And I know it will only last 15 minutes, too.

Page 12

correct?

A Correct.

Q And from '72 to '76, the Housing Opportunities Council?

A '71, '72, '73 to '76, the Housing Opportunities Council, yes.

Q Okay. And then in 1976, you went to the National Urban Coalition?

A That's correct.

Q And do you recall what you did after that?

A For a year, I did consulting work. I was a private practice consultant.

Q Okay.

Q And then in 1981, I went to work at the Children's Defense Fund as communications director. You want me to keep going?

A Okay.

Q And that was '81 to '88; is that correct?

A That's correct.

Q And is that where you met the First Lady?

A Yes, that's correct.

Q And the President?

A Yes.

Q He wasn't the President then, but President Clinton?

A Yes. I think I met him once there, yes.

Page 13

Q And she was affiliated with Children's Defense Fund?

A She was chairman of the board.

Q And I understand from '88 to '93, you were press secretary to Senator Biden?

A That's correct.

Q And January '93 to October '94, were you assistant to Maggie Williams, who was the First Lady's chief of staff?

A That's correct.

Q And then in October '94, did you become deputy press secretary for operations?

A I was deputy assistant to the President and deputy press secretary for operations working in Mike McCurry's office.

Q All right. And he's the -- what is he officially?

A He's the White House press secretary.

Q Okay. And how long did you hold that?

A I worked for McCurry -- well, McCurry didn't come until January. I worked from October to December for Dee Dee Myers, and from January to -- January '96 to January -- I'm trying to think of what the last year of the administration was -- to '95, I worked for McCurry. And then in --

Q But the same job -- you had the same title?

A Yes, yeah. Two different bosses.

Page 10

(Brief interruption to proceedings.)

THE WITNESS: Thanks very much.

MS. WIRTH: You're welcome.

MR. WISENBERG: You don't have a cup yet.

MS. WIRTH: He's looking for a cup.

THE WITNESS: Okay. Why don't I just pour it down my throat.

MS. WIRTH: As soon as we find one, we'll get you one.

(Brief interruption to proceedings.)

THE WITNESS: Thank you.

MR. WISENBERG: Let the record reflect that attorneys Binhak and Wirth have returned with a cup.

THE WITNESS: Thank you.

MR. BINHAK: Two cups.

THE WITNESS: Yes. Thank you. Because I know I won't know how to work that (indicating).

MR. WISENBERG: Well, I'm barely ahead of you there.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

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THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

THE WITNESS: Okay. Thanks a lot. Okay. Let's go.

Page 14

Q Right. All right.
 A And then I worked for Panetta as deputy chief of staff -- assistant to the President and deputy chief of staff from January '96 to January '97.
 Q And since then, you've been at Voice of America?
 A I came to Voice of America March -- March 3.
 Q Okay.
 A I was -- I took six weeks off.
 Q All right. So about a year as deputy chief of staff?
 A Just a year, correct.
 Q Okay. And did you replace or precede Erskine Bowles in that job?
 A Replace.
 Q Okay. I am going to show you something and mark it -- and let the record reflect that I'm taking what appears to be a -- this appears to be a floor plan of the first floor of the West Wing of the White House. Have I gotten that right?
 A Yes. It's -- yes, even though I never knew the room numbers.
 Q Okay. And I'm going to mark this, and would you confirm for the grand jurors that I'm marking this as Grand Jury Exhibit EL-1; is that correct?
 A Yes.

Page 15

Q And let me ask you: I'm pointing to a room which is -- what appears to be a room on this floor plan that is just to the left of the Roosevelt Room; is that correct?
 A Yes.
 Q Would that have been your office?
 A Yes.
 Q Okay. And before you, it would have been Mr. Bowles' office?
 A That's correct.
 Q What I'm going to ask you do with my pen is, in the room where you worked, simply put the initials "EL."
 A (Witness complies.)
 Q And then -- you've put "ESL," which is fine. And then if you could put your dates by month and year. I guess 1/96 to 1/97.
 A (Witness complies.)
 Q Okay. And I'm just going to briefly -- pardon me. I didn't mean to yank that out of your hand.
 A Let me show this -- just hold it up briefly to the grand jurors. We don't have copies for them.
 Q This is the room that has been marked right to the left (indicating).
 A All right. So your office was within the West Wing; is that correct?
 A That's correct.

Page 16

Q Most of our questions today, I believe, will focus on the period that you were deputy chief of staff to Mr. Panetta.
 A You mentioned that you met the First Lady when she -- when you were with the Children's Defense Fund; is that correct?
 A Yes.
 Q And would you consider her to be a friend of yours, as well as a professional colleague?
 A Yes.
 Q Okay. And would that be true at this point in time of President Clinton?
 A Yes.
 Q And let me ask you if you know an individual by the name of Monica Lewinsky.
 A Yes.
 Q Can you tell us when you first met Ms. Lewinsky.
 A No. She was an intern, but I'm not sure exactly when I met her.
 Q Okay. Let me ask you where you were located, where your office was -- I don't know that's it's on this map -- when you were deputy press secretary for operations.
 A This is just the second floor -- that is, just the first floor?
 Q Yes.

Page 17

A (Examining document.) This is McCurry's office, this is the NSC. I think this was my office. If this is the front door coming into the building -- coming into the West Wing (indicating) --
 Q Yes, ma'am.
 A -- my -- this was -- (indicating).
 Q This first area here?
 A Yes.
 Q All right. I'm going to ask you to put your initials there also.
 A (Witness complies.)
 Q Was that your office the entire time you had that position?
 A Yes.
 Q All right. I'd ask you to put the --
 A What did I say -- 10/94 --
 Q Yes.
 A -- to 1/ --
 Q If there was no break in service, that would be up to 1/96?
 A 1/96. Okay.
 Q All right. So do you recall which of these positions you were in when you met Ms. Lewinsky and she was an intern? That is, were you already a deputy chief of staff for Mr. Panetta, or were you still working for Mr. McCurry?

Page 18

A I think I was working for McCurry. But the reason that I think I was working for Mr. McCurry is that that's when -- from accounts I've been reading. I can't tell you exactly when it was.
 Q Okay. All right. You're not sure from your own memory?
 A No.
 Q Okay. Now, obviously, assuming that she was an intern in 1995 sometime, you would have been working for Mr. McCurry at the time.
 A That's correct.
 Q Tell us a little bit about the White House intern system. How does it work? Did you have anything to do with running it and the input into it?
 A The White House interns program was run by a director. And no, I did not have any input into it, and I did not have any formal role in running it, no.
 Q When you became deputy to Mr. Panetta --
 A We had -- actually, let me back up for a second.
 Q Sure.
 A We had interns in the First Lady's office; we had interns in McCurry's office; and we had interns in chief of staff office.
 Q And when you say you had interns in the chief of staff's office, do you mean literally in Mr. Panetta's

Page 19

office -- which is Room 111 on this map -- or do you mean in this office in the OEOB?
 A Panetta didn't really like to have interns sitting outside. We had them outside to answer the phones occasionally.
 A I'm going through my mind's eye and trying to figure out -- there were interns at different places around chief of staff's office at different times, yes.
 Q Okay. And again, I just want to make clear for the record, when you say "chief of staff's office" do you mean the one that's in the corner here -- 111 on the map -- or you mean more in institutional sense?
 A More in the institutional sense. If Panetta needed an intern, he would bring somebody over to answer the phone, if the phones were busy.
 Q Okay. But you say he didn't like them hanging around in the West Wing, or around his office?
 A Yeah. Yeah. He liked regular staff doing those functions when it was possible. It wasn't always possible.
 Q Why was that? Do you know why he felt that way?
 A I think we all felt the same way. It's better to have regular staff, to the extent that we could. Sometimes we couldn't.
 Q When you became deputy chief of staff, were you the operational, or the political deputy?

Page 20

[1] A Operational. I was deputy chief of staff for
 [2] White House operations.
 [3] Q Would it be fair to say that you had more
 [4] authority, more power in that job than you had in your
 [5] previous job?
 [6] A Officially, yes. Unofficially, no.
 [7] Q All right. About the same, or less?
 [8] A More. I had -- oh, you mean in the deputy -- in
 [9] McCurry's office, or in Panetta's office?
 [10] Q In Panetta's.
 [11] A Well, obviously, I was deputy chief of staff. Of
 [12] course, I had more power. But authority -- yes. Job title
 [13] meant authority, yes.
 [14] Q Okay. Once you got to be deputy chief of staff for
 [15] Mr. Panetta, if you saw something that concerned you about an
 [16] intern or the intern program, would you be able to insert
 [17] yourself into that process and be listened to?
 [18] A Yes. Yes. Also before that, yes.
 [19] Q All right.
 [20] A That's why I was smiling.
 [21] Q Okay. All right. Even before then? How did you
 [22] come to have that say-so, let's say, even before you went to
 [23] work for Mr. Panetta?
 [24] A Let's just say self-imposed authority.
 [25] Q Okay.

Page 21

[1] A Let's put it that way.
 [2] Q And why did you feel you needed to exercise that?
 [3] A Because very often, the kids would hang around, and
 [4] I didn't like it.
 [5] Q Okay.
 [6] A And they weren't supposed to be there, and I made
 [7] them go away.
 [8] Q Hang around the West Wing?
 [9] A Anywhere in the White House -- wherever I saw them.
 [10] Q All right. You preferred that they be -- unless
 [11] they had a specific reason to be in the White House, that
 [12] they be over at the OEOB?
 [13] A That they be at their posts -- wherever that
 [14] may be.
 [15] Q Okay. How long is a person, if you know, typically
 [16] a White House intern?
 [17] A I think it's semester, semester, summer. And I
 [18] don't know exactly the dates. I think there are -- if I'm
 [19] not mistaken, I think there are three terms -- three shifts.
 [20] Q Is it fairly hard -- I'm sorry, I didn't mean to
 [21] cut you off.
 [22] A No, you didn't cut me off. I'm going through it in
 [23] my mind. I think that what it is -- three.
 [24] Q At what stage in life is a person typically a
 [25] White House intern?

Page 22

[1] A Usually, in the last couple of years, or as a
 [2] graduate of -- the last couple of years of college, or
 [3] after graduation.
 [4] Q Kind of a stepping stone between college and
 [5] grad school or professional school?
 [6] A Yeah. Even though we prefer -- at least I
 [7] preferred that they be college -- yeah, mostly -- they're
 [8] mostly of college age.
 [9] Q How typical was it for an intern -- a given
 [10] intern -- to go directly from an internship to another job in
 [11] the White House?
 [12] A Not atypical.
 [13] Q Not atypical?
 [14] A No.
 [15] Q Okay.
 [16] A I would say maybe -- I was thinking about this
 [17] before I was coming here. I would say maybe 25 percent of
 [18] them. It was -- probably about 25 percent.
 [19] Q And would it be just like anybody who wanted to
 [20] could do it, or would you have to have performed particularly
 [21] well to do it?
 [22] A I think the latter.
 [23] Q All right. Who would make that determination, if
 [24] you know, as a general matter, of whether or not an intern
 [25] got to stay on at the White House?

Page 23

[1] A If the intern were working for a senior staff
 [2] person, and he or she had done a good job, and there was a
 [3] low-level slot open. I think if all of those things came
 [4] into play, then an intern could apply for a job -- be
 [5] considered for a job.
 [6] Q How difficult was it to get to be a
 [7] White House intern?
 [8] A To get to be a White House intern?
 [9] Q Right.
 [10] A I'm not really sure of the process. I know there's
 [11] a long application process. I can't tell how it goes.
 [12] Q Is that any screening of interns to make sure that
 [13] they're not security risks, or anything like that?
 [14] A I believe there is, yeah.
 [15] Q Do you know what that is?
 [16] A No. I just think that there is a process, but I'm
 [17] not -- I don't know what the process is.
 [18] Q Monica Lewinsky went from being an intern to
 [19] being a staffer in office of legislative affairs; is
 [20] that correct?
 [21] A Yes.
 [22] Q Do you have any idea how she was able to make
 [23] that transition?
 [24] A No.
 [25] Q All right. You don't know who recommended her

Page 24

[1] for that?
 [2] A No. I don't.
 [3] Q Do you remember anything about her from the
 [4] time that she was an intern, before she went to work for
 [5] office of legislative affairs?
 [6] A I can't -- no. I can't tell you if I saw her
 [7] hanging around then or -- I can't tell you the exact time --
 [8] the exact period when I saw her hanging around. I can't.
 [9] Q Okay. And when you say you can't tell us the exact
 [10] time period you saw her hanging around -- tell us what you
 [11] mean by that.
 [12] A When the interns come to the White House --
 [13] when anybody comes to the White House, it's very exciting
 [14] initially, and even though the interns are given a briefing
 [15] about where they need to be, and where they're allowed to
 [16] stay, and what their roles are, and what they should be
 [17] wearing, and that they're not allowed to come to events,
 [18] there are always a few every term who are eager to be -- to
 [19] be around a little bit more. That's the best way I could
 [20] put it.
 [21] Q Now, is that to be around kind of where the action
 [22] is, or around to maybe get noticed by the President, or just
 [23] by other powerful people, or --
 [24] A Yes, yes, and yes.
 [25] Q Okay. And was Ms. Lewinsky one of these people?

Page 25

[1] A Yes.
 [2] Q All right. Is that your first memory of her? Is
 [3] that the first time you basically noticed her, is when you
 [4] noticed her hanging around?
 [5] A Yes.
 [6] Q All right. First, tell us everything that you
 [7] noticed and what conclusions you drew from it, or what you
 [8] thought about it or did about it.
 [9] A I saw her where she shouldn't be, and I told her to
 [10] get back to her post.
 [11] I saw her where she shouldn't be, and said, "What
 [12] are you doing here?" She would say occasionally, "Oh, I'm
 [13] making a delivery," or -- and I would say, "If you don't have
 [14] work here, go back to your post."
 [15] If she told me that she needed to wait someplace, I
 [16] said, "Wait someplace else."
 [17] Q Do you know where her post was?
 [18] A I'm not sure where -- I don't remember where
 [19] legislative affairs mail -- congressional mail was answered.
 [20] Legislative affairs -- the senior people in
 [21] leg. affairs had an office on the second floor of the
 [22] West Wing. The less senior members of that staff had an
 [23] office -- had offices in the East Wing, which is more where
 [24] the residential part of it was.
 [25] I don't know where correspondence was handled. It

Page 26

may have been in the Old Executive Office Building across the
 -- across the way, but I'm not sure. I don't remember.
 Q Or it could have been in the East Wing or the
 West Wing, one floor up?
 A I don't think that's where they handled mail. I
 think that's where just the senior people were.
 Q Okay. So more likely to be the East Wing --
 A Right.
 Q -- or OEOB.
 A Right. Now, let me stop you there, because I think
 if I understood you correctly, you said you can't remember
 whether she was still an intern or in office of legislative
 affairs when you first noticed this behavior.
 But let's assume she was in the office of
 legislative affairs and that her office was in the
 East Wing, okay?
 A Okay.
 Q I take it that even somebody who had White House
 security clearance, who regularly worked in the East Wing --
 you're telling us that you wouldn't want them hanging around
 the West Wing, if they weren't authorized to be there
 (indicating)?
 A You don't have to point to a room. I don't want
 them here (indicating).
 Q Okay. And your hand is covering the whole --

Page 29

A It also seemed as if she was being more creative
 about where she was, about where she would be.
 Q Okay.
 A If I would tell her to get out of the hall, I would
 see her -- then I would see her at an event. So there was
 always a different place that I would see her.
 Q You've said maybe 5, maybe 10 times. Do you
 recall, roughly, what time span? In other words, did you
 notice all this in a three-day period, or was it more like
 something -- three weeks or a month or --
 A No, it was definitely was not a three-day period.
 It was over a longer period than that. And I know from
 accounts, again, that I read, that she was moved in April
 of '95. That was something that I didn't remember, that
 I -- I've read.
 Q Moved from where to where?
 A When it said -- when she was moved out of the
 White House.
 Q Okay. All right. Is it possible that that could
 be April of '96 that you're talking about, rather than '95?
 A Yes, yes. Sorry. Yes.
 Q Okay. Now, if you could tell us, or show us on the
 map -- what were some of the places that you would see her?
 A How do you want me to indicate this? Just --
 (indicating)?

Page 27

A That's right.
 Q -- floor plan there of the West Wing.
 A That's right.
 Q Okay. Now, was that something that you
 came up with on your own, or was that in conformity
 with Mr. Panetta's wishes, or both?
 A What?
 Q This idea that you don't want people -- whether
 they're interns or anybody else -- people who don't belong
 here hanging around the West Wing?
 A I don't -- I think it's common sense. I don't
 think it was a discussion that needed to be had.
 Q All right. Do you know whether or not Mr. Panetta,
 when he became chief of staff, kind of toughened things up in
 that regard -- you know, whether or not -- there had been a
 little more laxity, in terms of who got to wander in and out?
 A You mean prior to Leon's coming?
 Q Right.
 A Yes. I would say that before Leon, it was not
 as -- yes.
 Q All right. Not as tight a run ship -- is
 that fair?
 A Yes.
 Q I guess tightly run would be grammatically
 correct.

Page 30

Q Well, let me give you my pen, and maybe --
 A What is this?
 Q This, according to this map, says "West Terrace
 Upper Level" and "West --"
 A This is outside?
 Q "-- Lower Level." I can't characterize what
 it is, but --
 A Okay. There was a -- I would see her in the lower
 press office, for example, that was right outside the
 briefing room.
 Q Okay. Could you put a "M" where --
 A No.
 Q Is it on the map?
 A I don't know. I -- that's why -- I don't know what
 this is.
 Q Okay.
 A McCurry's office -- if you -- if you walked out of
 McCurry's office from one door, and you walked out of the
 waiting area outside the Oval, and you came into a hallway,
 then there was a ramp. And that ramp led to what we call the
 lower press office through which the President would go into
 the briefing room. That's what you see on television when
 you're watching anybody in the White House give a briefing.
 So sometimes I would see her there.
 If you continue past -- and that's why I can't mark

Page 28

A Mm-hmm. You're remembering that I was an
 English teacher.
 Q Yeah. Well, you've thrown me for a loop there.
 Do you recall how long a period of time you
 witnessed these events before you said, "I'm going to do
 something about that person"?
 A You mean seeing her?
 Q Yeah. For instance, you've mentioned that you --
 you said, "I saw her there and told her to get back to her
 post," and you said it for us about three times.
 I mean, do you recall, first of all, how many times
 you had to say it, and over what period of time before you
 made a mental determination that person needs to move -- if
 you did -- that person needs to be moved?
 A I'm not sure of the question you're asking. Let me
 answer it this way: How many times did I see her before I
 spoke to her? I spoke to her the first time, as I would
 speak to any intern.
 Q Okay.
 A I mean, she didn't get any different treatment from
 anybody else -- intern or staff member.
 How many times did I see her before -- before I
 determined that she should be moved? (Shrugging.) I don't
 know -- 5, 10.
 Q Okay.

Page 31

it there. I don't know what this is.
 Q Sure. Well, let me ask you a question: That
 briefing room -- what level is that on?
 A Lower press -- lower -- it's not on the -- it's not
 on the first floor. It's a lower floor.
 Q Okay. All right. So you can't mark it here,
 because this is just --
 A No.
 Q Fine.
 A This is just the second floor.
 Q Okay.
 A Then if you continue past the briefing -- the lower
 press office, there is what we call the colonnade. That's
 what I'm asking you -- if that's what this is. Which is
 an outdoor area abutting the Rose Garden, which leads you
 outside into the East Wing. And occasionally, I would see
 her on the colonnade.
 Q Okay. And could this be the colonnade here,
 running right along the Oval Office and the cabinet room?
 A No, the colonnade is more that way (indicating).
 Q Okay. Across?
 A Mm-hmm.
 Q Okay.
 A Because if here's the West and here's the East, the
 colonnade was the -- was the connector that way (indicating).

Page 32

[1] Q Okay. So if I understand, the press briefing
 [2] room --
 [3] A It was the -- if you walk down the ramp, there was
 [4] a reception area. There were offices over here of the two
 [5] deputy press secretaries, other assistant press secretaries,
 [6] who would process paper (indicating).
 [7] Here was the briefing room. Here was that
 [8] reception area. Here was the briefing room (indicating).
 [9] Reporters hung around the briefing room, and they
 [10] had their offices in the back. And the reporters were
 [11] permitted to come into this reception area to ask the people
 [12] in the lower press office for papers or whatever press
 [13] releases we were handing out.
 [14] And reporters were allowed access up the ramp, up
 [15] until McCurry's office. They were allowed to come into
 [16] McCurry's office, to knock on the door and come in, or to
 [17] hang around the upper press office, which is where my --
 [18] they were allowed over here, which is where my office used
 [19] to be (indicating).
 [20] Q Okay. All right. And you saw her -- within that,
 [21] what you've just described, you would see her?
 [22] A Occasionally down there, yes.
 [23] Q Okay. And the colonnade also?
 [24] A Once in a while in the colonnade.
 [25] Q Where else did you see her?

Page 33

[1] A I saw her a couple of times hanging around the West
 [2] west lobby, which is where guests come in.
 [3] Q Okay.
 [4] A And once or -- probably once, after I saw her
 [5] outside the area where -- it was outside the -- right here,
 [6] outside the cabinet room area (indicating).
 [7] So it was not the oval reception area, but this
 [8] (indicating) -- before you went down to the ramp.
 [9] Q And when you say the -- I think you said the west
 [10] lobby you saw her once?
 [11] A Where is the front door?
 [12] Q This is the --
 [13] A Here is the front door.
 [14] Q All right.
 [15] A Right in here (indicating).
 [16] Q All right. And it says "Lobby" there.
 [17] A Right.
 [18] Q Okay. So -- all right. I'll ask you to put
 [19] an "M" -- could you just put an "M" there somewhere in the
 [20] lobby area.
 [21] A (Witness complies.)
 [22] Q And an "M" where you think you saw her near the
 [23] cabinet room.
 [24] A (Witness complies.)
 [25] Q All right. This is an area -- you've marked

Page 34

[1] your second "M" in kind of a waiting area off of the
 [2] cabinet room.
 [3] A Mm-hmm -- yes.
 [4] Q And this right over here that I'm pointing to
 [5] -- kind of at 1 o'clock off of the Oval Office -- is where
 [6] Betty Currie sits, correct?
 [7] A (Nodding.)
 [8] Q It's called the reception area?
 [9] A Yes. Yes.
 [10] Q Okay. All right. Where else did you see
 [11] Monica Lewinsky?
 [12] A I don't know where else. I don't remember
 [13] where else.
 [14] Q All right. Were there other places that you
 [15] saw her?
 [16] A I probably saw her at -- actually, I do remember.
 [17] I think I saw her at a reception. But I think she was gone
 [18] by then.
 [19] Q Okay. Gone from the White House?
 [20] A Yes.
 [21] Q When you would see her, if you recall, these 5 to
 [22] 10 times, would she typically be alone?
 [23] A Yes.
 [24] Q All right.
 [25] A Always.

Page 35

[1] Q As this pattern repeated itself, were you
 [2] harsher with her, or did you say anything like, "I've
 [3] told you this before?"
 [4] A No, I don't think so.
 [5] Q What do you recall her attitude was when you would
 [6] catch her?
 [7] A She scampered away.
 [8] Q Okay. Would that be typical for an intern who
 [9] was being caught where he or she knew she shouldn't be by
 [10] somebody of your stature?
 [11] A Yes. But an intern who was caught by me, I would
 [12] never see again.
 [13] Q Except for Monica Lewinsky?
 [14] A Yes. A couple of other -- actually, let me
 [15] amend that. A few exceptions. Most interns, I would
 [16] never see again.
 [17] Q All right. Meaning, that they simply didn't try
 [18] it again?
 [19] A Yes.
 [20] Q As far as you know.
 [21] A They didn't try it again with me, let's put it
 [22] that way.
 [23] Q Were you known as kind of the enforcer among
 [24] the interns?
 [25] A That was the more -- one of the more polite things

Page 36

[1] they called me.
 [2] MR. WISENBERG: Okay. Tell me when it's break
 [3] time.
 [4] FOREPERSON: A quarter till.
 [5] BY MR. WISENBERG:
 [6] Q Okay. All right. Other than the fact that you saw
 [7] her these 5 to 10 times, what, if anything, else concerned
 [8] you about this individual?
 [9] A Her attire.
 [10] Q Describe what it was that concerned you about it.
 [11] A I don't know. Her skirts were probably too short.
 [12] It doesn't take much more than that to set me off.
 [13] Q All right. And why is that?
 [14] A Because I just think it's inappropriate attire in
 [15] the White House -- in any professional place.
 [16] Q All right. What else about what you saw? Right
 [17] now, I'm just talking about what you, yourself, saw. You saw
 [18] her hanging around several times, and you saw attire that you
 [19] didn't think was appropriate.
 [20] A Yes.
 [21] Q What else?
 [22] A I'm not sure there was much else.
 [23] Q All right. Now, what, if anything, did you hear
 [24] from anybody else? What, if anything, about this individual,
 [25] Monica Lewinsky?

Page 37

[1] A (Shrugging.) Mostly that she was a clutch, and she
 [2] -- what we used to call a "clutch." And that she was always
 [3] someplace she shouldn't be.
 [4] Q All right. Now, describe for us here what a
 [5] "clutch" means.
 [6] A It's a slightly derisive term for somebody
 [7] who, whenever he or she sees the President -- or any of
 [8] principals, let's put it that way; not even the President,
 [9] any of the principals -- would want to be around, or would
 [10] hover, or be close.
 [11] Q Okay. Now, this is not an unheard of phenomenon
 [12] with interns?
 [13] A No. I think it's fairly typical, even though
 [14] many of them are spoken to. It's very -- it's very -- it's
 [15] understandable for people to meet the President or Hillary or
 [16] the Vice President for the first time -- it's very -- it's
 [17] very hard for most people to behave normally around them
 [18] the first couple of times they meet them. It's perfectly
 [19] understandable.
 [20] Which is why we would try to talk to the
 [21] interns, when they came in, to tell them what was appropriate
 [22] behavior, because I think it was difficult to know, really,
 [23] what was appropriate behavior.
 [24] And I'm am not sure if I can explain it any better.
 [25] Q No, that --

Page 38

[1] A It's someone who shakes hands on a rope line, and
 [2] as the Presidents keep walking down the rope line, this
 [3] person keeps following along with them.
 [4] Q Okay. Do you recall who in particular might have
 [5] identified Monica Lewinsky to you as a clutch?
 [6] A No. I think I saw her myself.
 [7] Q Okay. Because I had switched over to the area
 [8] from --
 [9] A Oh, who told me?
 [10] Q -- from what you saw to what you heard.
 [11] A I don't remember. I don't remember.
 [12] Q Okay. Just generally --
 [13] A Yeah.
 [14] Q Is it fair to say she had that reputation?
 [15] A Yeah, mm-hmm.
 [16] Q Okay. Did you ever see her -- and forgive me if
 [17] I've asked this before, but did you ever see her any of the
 [18] times that you saw her these 5 to 10 times you're talking
 [19] about around the President?
 [20] A No.
 [21] Q Did you ever see her around anybody else who
 [22] you would call a clutch -- somebody that a clutch would
 [23] want to --
 [24] A No.
 [25] Q -- clutch onto?

Page 39

[1] A No.
 [2] Q Okay. Are you aware of the rumor and speculation
 [3] in the last week or so in the media about an incident that
 [4] might have been witnessed involving Ms. Lewinsky?
 [5] A Yes.
 [6] Q And I believe a denial was issued on your behalf
 [7] and on Mr. Panetta's behalf --
 [8] A That's correct.
 [9] Q -- by the White House?
 [10] A That's correct.
 [11] Q And I think it's fair to say this rumor has various
 [12] incarnations, so I'll just describe it as a rumor that
 [13] somebody witnessed Ms. Lewinsky and the President in a
 [14] compromising situation and that it somehow got reported to
 [15] you. Are you familiar with rumors along those lines?
 [16] A I'm familiar with the rumors, yes.
 [17] Q Okay. Did anything even remotely like that, as far
 [18] as you know, as far as was reported to you -- directly or
 [19] indirectly -- happen?
 [20] A No.
 [21] Q So what you're telling us is your concern about
 [22] this individual was based upon what you observed and that
 [23] it was primarily suggestive or inappropriate clothing and
 [24] hanging around the West Wing too much -- is that fair to say?
 [25] A Yes. And she was not the only one. I want to make

Page 40

[1] that clear. She was not that unusual. She was unusual in
 [2] that she was persistent, but there were many, many kids
 [3] like this.
 [4] Q Okay. I'm not trying to paint her as anything in
 [5] particular. I'm just trying to get at the basis of whatever
 [6] decision you made.
 [7] Plus, as I understand it, to those two things I've
 [8] mentioned, she had, if I understand you, a reputation as
 [9] being a clutch -- is that fair to say?
 [10] A Yes.
 [11] Q But other than that -- directly, indirectly,
 [12] rumor -- nothing else?
 [13] A No.
 [14] Q All right. You didn't hear anything about -- I'm
 [15] talking about the basis of any action you took. You've
 [16] identified them to us here today.
 [17] A Yes.
 [18] Q So nobody really brought this to your attention.
 [19] This is your discovery.
 [20] A Yes.
 [21] Q What did you do about it?
 [22] A Which part?
 [23] Q Well, what did you ultimately decide to do? Every
 [24] time you saw her, you told her to get back to her post --
 [25] A Right.

Page 41

[1] Q And she had a hard time doing that.
 [2] A Right.
 [3] Q So what did you ultimately decide to do about it?
 [4] A I decided to get rid of her. But I talked to her
 [5] supervisor -- don't ask me who. I've been -- I don't know
 [6] who I talked to.
 [7] And I said -- I think I asked about how she was
 [8] doing. And he or she -- I can't remember who I talked to --
 [9] said not very well, correspondence is not in great shape.
 [10] And I said, "Get her out of here."
 [11] Q Okay. Now, could that have been an individual by
 [12] the name of Jocelyn Jolley, if you know?
 [13] A To whom I spoke?
 [14] Q Right.
 [15] A No.
 [16] Q Okay. Somebody named Keating -- Tim Keating?
 [17] A It may have been Tim. I don't remember.
 [18] Q Was there an individual in the office of
 [19] legislative affairs named Tim Keating?
 [20] A Yes.
 [21] MR. WISENBERG: Okay. I don't want to go over
 [22] my limit.
 [23] FOREPERSON: Thank you. I appreciate it.
 [24] THE WITNESS: So this means I can go home?
 [25] MR. WISENBERG: No. But it does mean -- a

Page 42

[1] 10-minute break.
 [2] FOREPERSON: Yes, a 10-minute break.
 [3] MR. WISENBERG: All right. May the witness be
 [4] excused?
 [5] FOREPERSON: Yes, she may.
 [6] MR. WISENBERG: And we'll come and get you in about
 [7] 10 minutes.
 [8] THE WITNESS: I look forward to it.
 [9] JURORS: (Laughing.)
 [10] (A break was taken from 2:45 p.m. until 3:04 p.m.)
 [11] **
 [12] FOREPERSON: Ms. Lieberman, I'd like to remind you
 [13] that you're still under oath.
 [14] THE WITNESS: Okay. Thank you.
 [15] BY MR. WISENBERG:
 [16] Q Let the record reflect that the witness,
 [17] Evelyn Lieberman, has returned to the Grand Jury room.
 [18] And you're the same Evelyn Lieberman who's been
 [19] testifying for us this afternoon; is that correct?
 [20] A Yes.
 [21] Q All right. Could you recharacterize for us, or
 [22] tell us again, what is it you said to Mr. Panetta about
 [23] Monica Lewinsky when you finally made the decision?
 [24] Basically, that you wanted her out, or --
 [25] A To Panetta?

Page 43

[1] Q Yeah. I'm sorry, did you not --
 [2] A I don't think I said anything to Panetta.
 [3] Q Okay. I'm sorry. I'm sorry. Tell us what you
 [4] -- when you finally took the decision to get her out, as you
 [5] say -- who was it that you spoke to? I apologize if I've
 [6] asked it before and you've answered it.
 [7] A That's all right. I wasn't sir. I thought it may
 [8] have been -- you asked me if it were Keating. And I said it
 [9] may have been Keating. I'm not sure.
 [10] Q Okay. Now, do you think that this was in the time
 [11] period that you were deputy chief of staff -- when you made
 [12] the decision to transfer?
 [13] A To get her out of the White House?
 [14] Q Right.
 [15] A Yes.
 [16] Q Okay. Did you have any discussion with Mr. Panetta
 [17] about it?
 [18] A No. No.
 [19] Q Okay. Were you particularly sensitive to this
 [20] kind of situation? A young lady who was hanging around the
 [21] West Wing in what you consider inappropriate dress -- was
 [22] that a particular concern to you, given the rumors and
 [23] allegations about President Clinton that have floated
 [24] around over the years?
 [25] A Yes. But I also -- yes.

Page 44

Q Okay. And was that a reason that you even had a more heightened sensitivity to something like this -- what you've described to us that you witnessed?

A No, I wouldn't characterized it that way. I think I need -- the one thing I'm trying to explain is that Monica was not a singular case, as far as I was concerned. I mean, there had been many interns. I had moved other people. She was -- she was not someone who was an outstanding case to me. She -- as a matter of fact, I didn't know her name. Somebody reminded me of her name. So --

Q When was that?

A In the last months, when all of this started -- well, not -- obviously, not before I saw her picture. But she -- I would say that she was one of a number of people who we moved or -- who I moved or yelled at or --

Q Okay. And so was this something -- this particular concern you've discussed, given the reputational concerns, the rumors about the President -- was this something that Mr. Panetta was generally aware of and eager to -- also sensitive to?

A I'm not sure of the question. Are you asking me if Panetta and I talked about this or her or -- I'm not sure what the question is.

Q Well, no. Well, as I understand you testify, you did not talk to Panetta about Monica Lewinsky.

Page 45

A That's correct.

Q Okay. But you've stated -- correct me if I am wrong -- that one of the reasons this concerned you, what you witnessed with this young lady, was some of the rumors about President Clinton. So you were, I guess, especially sensitive when things like this happened. Is that a fair statement?

A I think I was concerned because the President was vulnerable to these kind of rumors, and I didn't need to -- yes, yes, that was one of the reasons.

Q Would it be fair to characterize it as an appearance problem?

A Yes, it would be fair.

Q Okay. You're not saying, are you, that you were afraid that something would happen between the President and one of these people, as opposed to you didn't want an appearance?

A That's correct.

Q Is that a fair characterization?

A Yes.

Q Okay. And is this appearance -- I'm going to call it the "appearance issue," if that's all right with you.

A Okay.

Q Is that appearance issue one that, as a general matter, you ever discussed -- not with respect Monica

Page 46

Lewinsky, per se, but just in general with Mr. Panetta?

A I guess I need to characterize this a little bit better. No, I don't think we would have had a discussion about this.

Q Okay. About this -- what I've called the appearance issue?

A Yeah.

Q Okay. Again, I want to make it clear, I'm not -- you've already testified you didn't discuss Monica Lewinsky with him. I just meant in general -- this general issue. Do you understand my question?

A The question is: Did I discuss appearances with Panetta?

Q Yeah, this appearance issue with Panetta.

A No, I don't think so.

Q Okay. We've talked about whether or not you had witnessed or heard any rumors about a particular incident involving the President and Ms. Lewinsky. Did you ever hear anything firsthand, secondhand, thirdhand at the White House -- or anywhere else, for that matter, during the period that you were there -- about a relationship between Ms. Lewinsky and the President?

A No.

Q Okay. Or since you've been at Voice of America, before the events of the last couple of weeks?

Page 47

A You mean, before reading about this in the paper?

Q Right.

A No.

Q Do you know an individual by the name of John Hilley?

A Yes.

Q Okay. What did he do?

A Hilley was chief of -- was assistant to the President for legislative affairs.

Q All right. Is it possible that he was the person you talked to about Monica Lewinsky?

A Possible. Possible.

MR. WISENBERG: Okay. Pat, did you have a question you wanted to ask about that -- about Mr. Hilley?

BY MR. O'BRIEN:

Q Are you aware of whether or not he ever gave any written recommendation for Ms. Lewinsky following her employment at the White House?

A No, I'm not.

BY MR. WISENBERG:

Q You told us earlier that, generally, about 25 percent -- you thought about 25 percent of the interns could hang on and get the White House jobs.

A I'm making up the number, but I think that's probably about right.

Page 48

Q Okay. And that it was standout performance or good performance that would allow that to happen. Is that --

A Yes.

Q Do you know anything about, of your own personal knowledge, what her performance was -- Monica Lewinsky's -- when she was an intern?

A No.

Q And I think you told us you don't know how she got her job originally --

A No.

Q -- in office of legislative affairs.

A No.

Q Okay. Our understanding is that Ms. Lewinsky was ultimately transferred to the Pentagon --

A Yes.

Q -- after perhaps a brief stay in Patsy Thomasson's area. Did you know anything about her working very briefly with Patsy Thomasson?

A No, I didn't.

Q Okay. Did you have anything to do with deciding exactly where she went?

A No.

Q Did you want her fired, or transferred?

A I didn't want her anything. I wanted her out of there.

Page 49

Q Okay. You don't recall whether you said just -- you gave a particular order to fire, as opposed to just get her out?

A I think the latter.

Q Okay. So you don't find it surprising that a place was found her for her somewhere else in government?

A No, I don't.

Q All right. Did you get any fallout or any flak from anybody about your decision to get Monica Lewinsky -- to get her out of there, as you say?

A No.

Q Did you know where she was ultimately sent?

A No.

Q What, if any, knowledge do you have about her revisiting the White House after you got her out of there?

A I saw her on a day that I was traveling. The -- either Panetta or one of his two deputies -- which was either Ickes or I -- would go on every trip with the President. And before a trip that we were taking, I saw her in the West Wing.

Q In the West Wing?

A (Nodding.)

Q Tell us where you saw her.

A I saw her in the west lobby.

Q Okay. And that's an area where you've already --

Page 50

[1] it's marked as just "Lobby" on our map, which is EL-1, and
 [2] you've already put an "M" there, correct?
 [3] A Yes.
 [4] Q Is that the time that you remember that you saw her
 [5] in the lobby?
 [6] A Yes.
 [7] Q All right. As opposed to when she had still worked
 [8] in the White House?
 [9] A I can't help you. I don't know.
 [10] Q Okay. You don't remember which. But you do recall
 [11] that -- you think this was the period after you had gotten
 [12] her out?
 [13] A Yes.
 [14] Q Okay. Now, what trip was that, if you recall?
 [15] A I don't remember.
 [16] Q All right. What did you do when you saw her?
 [17] A I went into the -- into Betty's office, and I
 [18] said --
 [19] Q That's Betty Currie?
 [20] A Yes. I said, "What is she doing here?" And she
 [21] said, "I told her that she could watch the departure."
 [22] Now, what that means is, when we would leave on a
 [23] trip, whichever -- either Panetta, Ickes, or I, whoever would
 [24] travel -- would be traveling that day -- would either meet
 [25] the President in the Oval and walk out to the helicopter, or

Page 51

[1] meet him in the dip. room -- the diplomatic reception area,
 [2] if he were coming down from the residence. And the chief of
 [3] staff person would walk with the President to the
 [4] helicopter.
 [5] We would go in the back door, and the President
 [6] would go in the front door and wave. And sometimes, we
 [7] would invite people to see the departure -- depending on what
 [8] it was.
 [9] And I -- I can't remember whether we were leaving
 [10] from the Oval or leaving from the dip. room, but Betty said
 [11] she was coming to watch the departure.
 [12] And there would be a roped off area on the lawn
 [13] where sometimes different groups of people would be invited
 [14] to see the President get on the helicopter, and sometimes he
 [15] would what we called work the rope line. He would walk
 [16] around -- people were standing behind a cordoned-off area,
 [17] and he would go over, if we had the time, and shake people's
 [18] hands and greet them.
 [19] Q Okay. When you said, "What is she doing there?"
 [20] did Ms. -- I mean, I notice, at least on the map, the lobby
 [21] isn't right close up to Betty Currie's reception area. It's
 [22] not like one room away.
 [23] Did she know who you were talking about, or did you
 [24] do more identification than say "she." or --
 [25] A I don't remember.

Page 52

[1] Q Okay. Did she seem to know who you were
 [2] talking about?
 [3] A Yes.
 [4] Q What did you say in response to Betty Currie?
 [5] A I'm trying to think if I said, "What are you --
 [6] nuts?" or, "I don't want her here," or -- (shaking head). I
 [7] expressed my displeasure.
 [8] Q All right. Do you if she had any response --
 [9] Ms. Currie -- to your displeasure?
 [10] A I think she was saying, "She's just here for a
 [11] departure."
 [12] Q Okay. Was there any line authority, chain of
 [13] command between you and Ms. Currie?
 [14] A Yes. I was the director of Oval Office
 [15] operations -- I oversaw Nancy Hemreich, who was the
 [16] director of Oval Office operations.
 [17] But Betty said, "You know what -- she's here for a
 [18] departure."
 [19] Q Okay.
 [20] A And then I just left it alone because we were -- we
 [21] were leaving.
 [22] Q Okay. Now, what do you mean. "What are you --
 [23] nuts?" Just because --
 [24] A I mean, "I kicked her out. What is she doing back
 [25] here again?"

Page 53

[1] Q Okay. So it bothered you to see her back, after
 [2] you'd kicked her out.
 [3] A Yeah, it did.
 [4] Q Any other occasions after you'd kicked her out that
 [5] you saw her back?
 [6] A Yes. I saw her once at a -- now, I don't remember
 [7] this. Somebody told me this. Whether I would have
 [8] remembered it on my own, I don't know.
 [9] I saw -- we have used to have Christmas parties all
 [10] during December. We would have sometimes two parties a day
 [11] -- receptions for different groups. And once -- and this
 [12] was on the occasion of one of the press parties.
 [13] We would have four press parties -- two on
 [14] consecutive days. And at one of these parties, I wanted
 [15] to know why she was there. And somebody said she came with
 [16] whomever she was working with at the Pentagon. It may have
 [17] been Willie Blacklow (phonetic), because he's somebody
 [18] I know.
 [19] And so clearly, she was invited by somebody else
 [20] because, although we invited members of the press, we also
 [21] invited cabinet press secretaries, as well, with guests.
 [22] Q And who did you talk to, if anybody, about it when
 [23] you saw her this other occasion?
 [24] A Oh, I'm sure I was just ranting. I don't know.
 [25] Q Okay. You would have complained about it?

Page 54

[1] A Who am I complaining to? I'm complaining to
 [2] myself. And someone said, "Please, she's here as -- this is
 [3] a press party. She works for a press secretary."
 [4] Q Okay.
 [5] A In other word, "Calm down, Evelyn. Mind your own
 [6] business," whatever.
 [7] Q Okay. But it bothered you when you saw it that
 [8] time also?
 [9] A Yes.
 [10] Q Okay. Any other times that you can remember that
 [11] somebody has reminded you when you would have seen her?
 [12] A No.
 [13] Q Did you ever see her in the Oval Office?
 [14] A No.
 [15] Q Did you ever see her in the President's study?
 [16] A No.
 [17] Q If you had walked in on her at any on one of those
 [18] places, I take it your concern would have been heightened?
 [19] A I don't understand.
 [20] In other words --
 [21] A If I would have walked in and saw anybody there, my
 [22] concern would have been heightened.
 [23] Q Okay. But I'm talking about particularly
 [24] Ms. Lewinsky. You've told us --
 [25] A No. Anybody. Anybody. What was an intern doing

Page 55

[1] in the oval? Anybody.
 [2] Q Okay. Or any low-level staffer?
 [3] A Not so much.
 [4] Q Okay.
 [5] A Not so much.
 [6] Q Because she went to office of legislative affairs
 [7] after she was an intern.
 [8] A Mm-hmm.
 [9] Q So when she's still at office of legislative
 [10] affairs, before you've had her kicked out, if you happened to
 [11] walk into the Oval Office and she was there, would that have
 [12] inherently been an unusual thing?
 [13] A It would have been an unusual thing, but
 [14] sometimes kids who were in there were in there because --
 [15] for example -- it's hard to explain. When the President did
 [16] his radio address on Saturday morning, he would do it in this
 [17] room (indicating) -- is this the Roosevelt Room?
 [18] Q Yes, ma'am.
 [19] A He would do it in the Roosevelt Room.
 [20] Q Okay.
 [21] A Let's say there were 50 or 60 invited guests -- 30
 [22] invited guests. There were chairs set up. Afterwards, we
 [23] would open this door, the President would go into the Oval,
 [24] he would stand in front of the desk. And there would be
 [25] photographers in there, and the people who attended the

Page 56

[1] radio address would be escorted in to take a photo with
 [2] the President.
 [3] Q Okay.
 [4] A So if there were interns or some staff members
 [5] whose families had been there, or people who were -- or
 [6] kids who were related to people he knew, it would not have
 [7] been unusual.
 [8] So there were different circumstances. If, for
 [9] example -- when I was in the press office, if the President
 [10] would be doing an interview in the Oval, and there would be
 [11] camera crews and all that, sometimes we would have interns
 [12] posted at certain places so they would know that people can't
 [13] come in because it was too -- because of the noise. And
 [14] sometimes, we would let them stand around the periphery,
 [15] so they could see what it was like -- how it worked.
 [16] Q So it would depend on the circumstances?
 [17] A Right. Absolutely.
 [18] Q Okay. But I want to focus on the period after
 [19] you've taken the step of making sure she's out of there --
 [20] A Okay.
 [21] Q -- because she's a persistent person with the
 [22] reputation of being a clutch.
 [23] And correct me if I am wrong, you've testified that
 [24] you saw her once in the west lobby before a departure -- a
 [25] presidential departure --

Page 57

[1] A Yes.
 [2] Q -- and once at a press party, is that correct?
 [3] A Yes. The press party, somebody told me I said
 [4] something about her.
 [5] Q So I guess what I'll ask you is: In that time
 [6] frame -- you've already gotten her out of there -- if
 [7] you had seen her even on more occasions and on areas closer
 [8] to the Oval Office -- Betty Currie's reception area, the
 [9] dining room, the study -- I take it that would have even been
 [10] much more of concern to you than having her over in the west
 [11] lobby -- is that a fair statement?
 [12] A Anywhere I would have seen her would have been of
 [13] concern to me. I want to know what she's doing back in
 [14] the building.
 [15] Q Okay. All right. You said you thought you
 [16] saw her on two occasions after you had gotten rid of her.
 [17] Have you heard that she might have been there even more than
 [18] two times?
 [19] A Yes, from press accounts.
 [20] Q Okay. But before the press accounts --
 [21] A No.
 [22] Q -- you had not heard that?
 [23] A No.
 [24] Q Did you hear back at the time, the general time
 [25] period that you saw her come back, on the two occasions

Page 58

[1] that you saw her after she had gone -- did you hear any
 [2] rumor that a particular person wanted her back, or wanted
 [3] her to come back?
 [4] A No.
 [5] Q Okay. I want you to assume that you're still
 [6] deputy chief of staff at this period, and let's say that you
 [7] find out -- this is a hypothetical question. Let's say you
 [8] had found out that somebody had let Ms. Lewinsky back in,
 [9] cleared her through the WAVE system, cleared her in maybe
 [10] 10 to 15 times over a six-month period, and -- let me just
 [11] stop there. Would that have caused you concern -- after the
 [12] period that you had gotten rid of her?
 [13] A I guess it would have.
 [14] Q Let's put it this way: Would it have been
 [15] something you would have wanted to investigate?
 [16] A Yes.
 [17] Q And again, is that for the same reasons you've
 [18] talked about?
 [19] A It would have been for the same reasons that I got
 [20] rid of anybody who was there -- boy or girl.
 [21] Q Are aware of anybody who you've gotten rid of
 [22] for these kind of concerns -- being a clutcher -- who was
 [23] allowed back into the West Wing area, cleared through
 [24] on 10, 15 occasions?
 [25] A I'm not aware that she had been, so I'm not aware

Page 59

[1] of anybody who had been, no.
 [2] Q Okay. If you were told that this Monica Lewinsky,
 [3] who we've been discussing, had been -- and I'm not saying
 [4] this happened, but if you had been told she actually --
 [5] after Evelyn Lieberman got her kicked out, she was actually
 [6] cleared in by somebody about 16 times -- 16 different times
 [7] let's say, in a year, and was often cleared into an area
 [8] fairly close to the Oval Office. Number one, would that
 [9] surprise you?
 [10] A (Pause) The reason I'm hesitating is because I'm
 [11] trying to think of some of the kids who had been through who
 [12] are sons or daughters of friends, who may have come back for
 [13] one or another occasion. So -- (shrugging.)
 [14] I know the answer you're looking for is yes, but --
 [15] I guess so (shrugging).
 [16] Q Okay. Now, I don't want you to give me the answer
 [17] I'm looking for.
 [18] A You're asking me to make this up. I can't. So I'm
 [19] trying to give you an answer, when I can't.
 [20] Q Well, for the record, I'm not asking you to
 [21] make it up.
 [22] A Okay.
 [23] Q I'm asking a hypothetical. If you're --
 [24] A Well, a hypothetical is making it up. You're
 [25] asking me to make it up. That's a response to a

Page 60

[1] hypothetical.
 [2] Q Well, you've told us that the two time you saw her,
 [3] you -- I think your words were you "ranted" -- the two
 [4] times you saw her after you kicked her out?
 [5] A Right.
 [6] Q As far as you knew, was she a politician's
 [7] daughter, or somebody as you've just mentioned -- somebody
 [8] like that?
 [9] A Yes.
 [10] Q Okay. She was?
 [11] A Yes. She wasn't a politician's daughter, but she
 [12] was a friend -- she was a friend of a friend and supporter of
 [13] the President's and Hillary's.
 [14] Q Ms. Lewinsky was --
 [15] A Yes.
 [16] Q -- or somebody she was the daughter of?
 [17] A No. She was -- she was recommended, I learned
 [18] later, to the White House intern program by Mr. Kaye,
 [19] who was a supporter of Hillary's -- a friend of Hillary's
 [20] and the President's.
 [21] Q Okay. And when did you learn of Mr. Kaye's
 [22] recommendation for her?
 [23] A I didn't learn of his recommendation for her.
 [24] I learned of his -- when I -- when I said get rid of her,
 [25] somebody -- don't ask me who; I don't know -- somebody came

Page 61

[1] back to me and said, Walter Kaye was going to call me about
 [2] this. Or she -- no. She was going to ask -- Monica was
 [3] going to ask Walter Kaye to call me.
 [4] Q And you just assumed from that that Walter Kaye was
 [5] the connection, or did you do some investigation?
 [6] A I didn't do anything. I said, "I'm delighted to
 [7] hear it. Have him call me. I'd love him to talk to him and
 [8] explain to him why I'm getting rid of her."
 [9] Q Okay. I guess what I'm asking you -- and I'll
 [10] try to ask it in a simpler way -- is, you yourself
 [11] told us you only saw her twice after you got rid of her.
 [12] And you've told us why you wanted to get rid of her. On
 [13] each of those occasions, you were not happy with seeing her.
 [14] Is that correct?
 [15] A That's correct.
 [16] Q And apparently, were more unhappy with seeing her
 [17] than anyone else around you at the times when you saw her --
 [18] is that a fair statement?
 [19] A Yes.
 [20] Q And my only question is: Since that happened twice
 [21] -- if it had happened to you 10 times or 20 times, I take
 [22] it you would have been even more concerned. Is that a
 [23] fair statement?
 [24] A I don't know. It didn't happen 10 or 20 times.
 [25] That's what I'm -- it didn't happen 10 or 20 times. It

Page 62

[1] happened twice.
 [2] Q Do you recall any conversation you've ever had with
 [3] Leon Panetta about Monica Lewinsky?
 [4] A No.
 [5] Q Do you recall any conversation you've had with
 [6] President Clinton about Monica Lewinsky?
 [7] A Yes.
 [8] Q Tell us about that.
 [9] A After I had gotten rid of her, when I was in there,
 [10] during the course of a conversation, he said, "I got a call
 [11] about --" I don't know if he said her name. He said maybe
 [12] " -- an intern you fired." And she was evidently very upset
 [13] about it.
 [14] He said, "Do you know anything about this?" I
 [15] said, "Yes." He said, "Who fired her?" I said, "I did."
 [16] And he said, "Oh, okay."
 [17] Q He didn't ask you why?
 [18] A No.
 [19] Q That was the full extent of the conversation?
 [20] A Yes.
 [21] Q Was that the only conversation you had with the
 [22] President about Monica Lewinsky?
 [23] A Yes.
 [24] Q Did you ever have a conversation with the
 [25] First Lady about Monica Lewinsky?

Page 63

[1] A No.
 [2] Q Did she have any role whatsoever -- direct or
 [3] indirect -- in your decision to get rid of Monica Lewinsky?
 [4] A No.
 [5] Q Did you inform anybody, other than the individual
 [6] you've mentioned in the office of legislative affairs, about
 [7] your decision to get rid of Monica -- at the time that you
 [8] did it?
 [9] A I don't think so.
 [10] Q I take it, you wouldn't know who advised
 [11] Ms. Lewinsky that she was being reassigned?
 [12] A No, I don't remember.
 [13] Q Do you know what, if any, reason was given to her
 [14] as to why she was reassigned?
 [15] A I don't.
 [16] Q What, if any, knowledge did you have or do you have
 [17] that Vernon Jordan, in 1997, assisted Monica Lewinsky in
 [18] getting a job, or trying to get a job in New York?
 [19] A None.
 [20] Q That's either first person or through hearsay?
 [21] A Correct.
 [22] Q Aside from Vernon Jordan, what, if anything, do you
 [23] know or did you know about -- just generally, in the 1997
 [24] time period; mid to late 1997 -- Ms. Lewinsky's efforts to
 [25] find a job outside the Pentagon, in the New York area?

Page 64

[1] A None. No knowledge.
 [2] Q I want to clarify something. Did you testify
 [3] that anybody reminded you recently, but before this
 [4] Monica Lewinsky became a household word in the last
 [5] couple of weeks -- before that time period, had anybody
 [6] reminded you recently of Monica Lewinsky in any way shape
 [7] or form?
 [8] A Yes.
 [9] Q Okay. Tell us about that.
 [10] A As director of the Voice of America, in
 [11] September, we were dedicating a new television studio to
 [12] John Chancellor, who was one of the former directors.
 [13] And we were having a reception for him,
 [14] and we invited some of the former directors of the
 [15] Voice of America to come to the reception and to come
 [16] to a meeting afterwards.
 [17] And a woman came up to me at the reception, and she
 [18] said, "My name is --" I didn't remember her name -- I didn't
 [19] know her name. And she said, "My daughter used to be an
 [20] intern at the White House." And I said, "Oh?" And I said,
 [21] "What's her name?"
 [22] And she said -- she told me her name. She said her
 [23] name is Monica Lewinsky. And I said -- I said, "I don't
 [24] remember her." And she said, "Yes, you do." She said, "You
 [25] fired my daughter," or "You kicked my daughter out."

Page 65

[1] I didn't say anything. And she said, "You --" I
 [2] think she said, "You ruined her life on the basis of
 [3] something that she never did."
 [4] And I didn't say anything. I was somewhat
 [5] taken aback. And I think she said, "She's -- it's only
 [6] now --" maybe she said a year later or a year and a half
 [7] later -- "that she's starting to get her life back together."
 [8] or " -- figure out what she wants to do." And then -- that
 [9] was the end of the conversation.
 [10] And then she came back a few minutes later. And
 [11] she said, "I want you to understand that I understand what
 [12] you did and why you did it." And I said, "I appreciate your
 [13] saying that." And that was it.
 [14] Then she told me that -- she was with one of our
 [15] former directors, and she told me that the two of them were
 [16] engaged. And I congratulated them. And he said, "I'm sorry,
 [17] I can't stay for the meeting." And then they left.
 [18] Q When she made the first comment, before she came
 [19] back to you --
 [20] A Right.
 [21] Q -- to effect of, "You've ruined your daughter's
 [22] life," did you --
 [23] A Her daughter's life.
 [24] Q Her daughter's life. -- did you say anything
 [25] to her?

Page 66

[1] A No, I was -- first of all, I was trying to figure
 [2] out who this girl was. Remember, I was at the White House
 [3] for four years. If we have 200 or 250 per season, per shift,
 [4] and then -- no, I didn't say anything. I was kind of -- I
 [5] certainly wasn't going to start a scene or -- and I had
 [6] nothing else to say. It was one of the few times I didn't
 [7] have an answer to something.
 [8] Q Do you recall approximately when this was?
 [9] A Yes, September.
 [10] Q September of 1997?
 [11] A Mm-hmm -- yes.
 [12] Q Has --
 [13] A I looked it up. I asked somebody when this was. I
 [14] didn't remember -- when the event was.
 [15] Q You mentioned that conversation with President
 [16] Clinton. And you mentioned that was the only conversation
 [17] you had with him about Monica Lewinsky. Does that include up
 [18] to present?
 [19] A Yes.
 [20] Q To right now?
 [21] A Yes.
 [22] MR. WISENBERG: Do you all have some questions?
 [23] (No response.)
 [24] MR. WISENBERG: All right. Mr. Barger?
 [25] BY MR. BARGER:

Page 67

[1] Q Mrs. Lieberman, how many interns would you estimate
 [2] that you've had moved over the course of your time as deputy?
 [3] A You mean inside and outside? I don't know.
 [4] Q Let's limit it to those you had moved -- meaning,
 [5] having them removed from the White House.
 [6] A Several.
 [7] Q You can give us a range -- less than 10? More
 [8] than 10?
 [9] A Probably more than 10.
 [10] Q That you've had removed from the White House for
 [11] what you considered inappropriate --
 [12] A Oh, removed from the White House?
 [13] Q Correct?
 [14] A Four or five.
 [15] Q Okay. And of those four or five, how many of those
 [16] interns that you moved -- meaning, out the White House -- how
 [17] many of them came back?
 [18] A I have no idea.
 [19] Q Well, other than Monica Lewinsky, where you've gone
 [20] through the description of seeing her twice, how many others
 [21] that you had moved out of the White House came back, that
 [22] you recall?
 [23] A I think I saw one at a radio address -- a boy. And
 [24] there may have been others.
 [25] Q Okay. There may have been others, but you only

Page 68

Page 71

recall one --
 A Yes.
 Q -- besides Ms. Lewinsky?
 A Mm-hmm.
 Q Of the ones that you had moved or kicked out of the White House that came back, how many caused you -- when saw them again, caused you to become angry or annoyed, as you did with Ms. Lewinsky?
 A Every time.
 Q So how many times was that?
 A I don't know. I only remember this boy and her.
 MR. BARGER: Okay.
 BY MR. WISENBERG:
 Q How many came back 15 times?
 A I don't know that she came back 15 times. I wasn't there.
 Q But how many -- to your knowledge, how many that you've kicked out have come back 15 times -- that you're aware of?
 A I'm not aware of any.
 BY MR. BARGER:
 Q How many came back twice, besides Ms. Lewinsky -- to your knowledge?
 A I don't -- I don't know.
 Q The conversation you had with the President about

to Betty Currie's office?
 A Yes.
 Q Could you describe for us approximately how far away those two areas are -- in other words, where you saw Ms. Lewinsky, and where you went and talked to Betty Currie?
 A You mean spatially? No. I can show you, but I can't tell you how many feet.
 Q Okay.
 A It's from the lobby to -- where is Betty's office?
 Show him, please.
 MR. WISENBERG: I'm really not allowed to do that.
 THE WITNESS: Okay. Where is Betty's office?
 (Examining document.)
 MR. WISENBERG: Do you want to come around here, Mr. Barger?
 MR. BARGER: That's okay. I'll rephrase the question.
 MR. WISENBERG: Okay.
 BY MR. BARGER:
 Q I take from the fact that you have to look at the map to at least think about the question, that Betty's office in relationship to where you saw Monica Lewinsky was such that Betty was not in a position to see Monica Lewinsky where you saw her. Does that make sense?
 A You mean if she looked out her door?

Page 69

Page 72

Ms. Lewinsky -- approximately how long did that conversation last with him -- about Ms. Lewinsky?
 A Twenty seconds.
 Q Okay. And how long did the remainder of the conversation last, would you estimate?
 A Half an hour, 15 minutes.
 Q Was anyone else present with you with the President when you discussed Ms. Lewinsky?
 A No.
 Q During the entire conversation -- the half an hour conversation -- was it only the two of you -- the President and you?
 A Yeah. I think it was 15 minutes. I wouldn't say half an hour. It was probably about 15 minutes.
 Q And during that time period, it was only the two of in conversation?
 A Yes -- I think so.
 Q As best you recall?
 A I think so.
 Q Okay. And during the time that he discussed Ms. Lewinsky with you, was there anyone else there?
 A I don't think so.
 Q Has the President ever asked you about any other interns that you had moved or fired out of the White House?
 A No. I don't think so.

Q Right.
 A No. There was no -- there's no line between there and there.
 Q When you went to Betty Currie's office to -- for want of a better word -- complain about seeing Monica Lewinsky, was Betty in her office?
 A I think so.
 Q Okay. In other words, she was wasn't with you, and you --
 A No.
 Q -- didn't call her aside and say, "I want to go talk to you in your office."
 A No, no.
 Q All right. And I think you also testified earlier with Mr. Wisenberg that you don't recall -- as least as I recollect, you don't recall letting Betty Currie know the name of the individual you were talking about. Do you recollect that?
 Or let me ask it this way: Do you recall, did you tell Betty Currie who it was you were upset about being there?
 A I must have.
 Q Okay. And that's what I was going to ask you, because how would Betty know who it was you were concerned about? What did you do to let her know who it was you were

Page 70

Page 73

Q Now, you earlier testified that there were two occasions in which you saw Ms. Lewinsky after you had her moved out of the White House. And the second occasion, as I recollect, concerned a party.
 A Yes.
 Q Correct?
 A Now, somebody told me about that. That was my own -- that was not my own recollection. Somebody told me.
 Q That's what I was going to ask you. Do you recall who it was that prompted your recollection or jogged your memory about that? Who told you about the party, in other words?
 A I think it was Maryellen Glen, and the reason I remember this is that Maryellen Glen works with me now.
 Q Okay. Do you recall when it was that Maryellen Glen prompted your recollection? I mean, generally. Are we talking a year ago? Six months ago? A week ago?
 A Oh, probably a week ago.
 Q Okay. Now, the first occasion you saw her after you had her moved out of the White House, as I recollect, that was the situation where you went and talked to Betty Currie, correct?
 A Yes.
 Q Do you recall Mr. Wisenberg asking you some questions about where you saw Ms. Lewinsky in relationship

concerned about?
 A I must have identified her. I don't know.
 Q Now, let me go back to the four or five interns that you had removed from the White House. In general, who would you have given the instructions to to remove those individuals?
 A It depends.
 Q Okay. Well, just go through the possible universe.
 A Probably the intern director, maybe a colleague.
 Q Such as? I mean who would those colleagues be that you would feel sufficiently comfortable to say -- and that you did say -- in other words, go through the universe of people that you -- as best you recollect, you told, "I want you to get rid of that person. I want them moved out of the White House."
 A I would either say to the intern director or tell Jody Torkelson -- who was head of the office of management and administration -- to tell somebody. Maybe. I don't know. Maybe the person who was the supervisor in the division where that person worked.
 Q Okay. I may have described Ms. Lewinsky as an intern at the time you had her moved out of the White House. By that point, I think she might have been a staffer. So let me rephrase the question and ask it that way -- because I've

Page 74

[1] been saying "interns."
 [2] Would your answer be different if she was a staffer
 [3] that you wanted -- like Ms. Lewinsky, when you got rid of
 [4] Ms. Lewinsky, as a staffer, as opposed to an intern -- would
 [5] there be a different group of people you might go to have
 [6] that staffer removed?
 [7] A I'm not understanding the question.
 [8] Q All right. I called Ms. Lewinsky an intern, but in
 [9] fact, at the time you had her removed, she was --
 [10] A In what context?
 [11] Q She was on the staff, I believe, right?
 [12] A Yes.
 [13] Q Okay. Who would you have gone to, given her
 [14] position, to have her removed? I take it, you probably
 [15] wouldn't have gone to the intern director, since she was no
 [16] longer an intern.
 [17] A No, I would have talked to a supervisor.
 [18] Q Okay.
 [19] A Or whomever I talked on the particular staff.
 [20] Q And similarly, when I was asking you about
 [21] interns that you had had moved out of the White House
 [22] -- and you mentioned four or five -- I guess I need to
 [23] broaden the universe and say, of people in Ms. Lewinsky's
 [24] type of position -- in other words, staffers, as opposed to
 [25] interns -- how many staffers did you have removed from the

Page 75

[1] White House?
 [2] A A few.
 [3] Q Okay. And same -- I hate to go back all through
 [4] this, but --
 [5] A That's all right.
 [6] Q -- the same questions that would apply when I asked
 [7] you about the interns, or those staffers that you had moved,
 [8] how many came back that caused you to become angry, like you
 [9] did with Ms. Lewinsky?
 [10] A Of the staffers who came back? You know, it's not
 [11] a good question to ask. I mean, you're welcome to ask it,
 [12] but I'm rather intemperate, and I questions everybody's
 [13] moves there.
 [14] Q I assume you mean in connection with your job, and
 [15] not with being patient with me.
 [16] A No, no, no, no. That will come soon. I would have
 [17] been crabby about anybody.
 [18] Q Well -- okay. I guess I'm sort of beating around
 [19] the bush. Was there anyone that caused you to be become as
 [20] concerned as you were with Ms. Lewinsky, or was there anyone
 [21] that was in the same kind of circumstance as Ms. Lewinsky
 [22] that caused you to be as concerned as you were with her?
 [23] A And I'm trying to tell you that I was concerned
 [24] about everybody who was there or who was not there.
 [25] Q Okay. But I don't know if you answered

Page 76

[1] my question.
 [2] A Oh, I mean everybody who came back.
 [3] Q Was there anybody that caused you to be as
 [4] concerned as you were with her?
 [5] A And what I'm -- I guess my answer to you is yes.
 [6] MR. BARGER: Okay. Can I have just a second? Sol,
 [7] can I ask you --
 [8] MR. WISENBERG: Sure.
 [9] (Brief interruption to proceedings.)
 [10] MR. WISENBERG: Can I ask a couple while you're --
 [11] MR. BARGER: Yes.
 [12] MR. WISENBERG: Thank you.
 [13] BY MR. WISENBERG:
 [14] Q Ms. Lieberman, was there a time during the day,
 [15] generally, when you were deputy chief of staff, when the
 [16] President was left alone -- a nap time or something like that
 [17] -- relaxation time?
 [18] A Nap time? No.
 [19] Q Well, just a time where he -- any time during the
 [20] day in his typical daily schedule where, assuming there
 [21] wasn't a world crisis or a leader visiting, that he could
 [22] have some time to be left alone?
 [23] A I used to be in charge of -- oversee the
 [24] scheduling. And what we tried to do was to give him what
 [25] we called euphemistically phone and office time. But the

Page 77

[1] rea ty -- we tried to give him a couple of hours every day.
 [2] It almost never worked out that way. There were
 [3] always things that came up. There were always people who
 [4] wanted to see him.
 [5] But it was usually the time that we wanted him to
 [6] make his -- that he needed to make phone calls or do some
 [7] notes or sign things.
 [8] But there was not regular time set aside
 [9] every day, no.
 [10] Q Did you consider Ms. Lewinsky to be -- at the time
 [11] that you made the decision to transfer her out -- a security
 [12] threat, in the sense of someone who might actually assault or
 [13] harm the President?
 [14] A Oh, no.
 [15] MR. WISENBERG: Other questions?
 [16] A JUROR: I have a question. On the day that you
 [17] were about to travel with the President, and Monica was in
 [18] the lobby, how many other people did you inquire about why
 [19] she was there before you got to the President's secretary?
 [20] Or did you go directly to the President's --
 [21] THE WITNESS: Oh, did I ask anybody else about
 [22] her?
 [23] A JUROR: Yes.
 [24] THE WITNESS: No, I don't think so. I think I went
 [25] directly into -- into Betty's office.

Page 78

[1] A JUROR: Can you tell me why you would immediately
 [2] go to Betty's office to inquire -- or would that be the first
 [3] source? Or why would you make that the first inquiry?
 [4] THE WITNESS: Betty and I lived -- worked close --
 [5] worked in proximity, our offices were in proximity. I would
 [6] go in because she was -- she and I were the people who had
 [7] control over the area. Control is a bad word, but there
 [8] were a few people who knew when guests would come.
 [9] And if she were sitting in the visitor's office --
 [10] if she were sitting in the west lobby, that meant she was a
 [11] visitor. So that's why I went in there.
 [12] A JUROR: Could other people have visitors in that
 [13] same lobby, but have been admitted through other sources?
 [14] THE WITNESS: Oh, yes, yes.
 [15] A JUROR: Thank you.
 [16] BY MS. MYERS:
 [17] Q Ms. Lieberman, I have one question about your
 [18] conversation with President Clinton about Monica Lewinsky's
 [19] departure. You had mentioned that President Clinton said he
 [20] got a call regarding Monica Lewinsky being fired. Did he say
 [21] who had called him?
 [22] A No, I don't think so. I was trying to think -- I
 [23] can't remember if he did.
 [24] Q Do you know who called him?
 [25] A No. I think that it was -- but I'm saying this

Page 79

[1] only in retrospect. I thought it was Mr. Kaye from the way
 [2] -- Walter Kaye, from the way he was describing it. But I
 [3] can't -- I can't attest to that. I'm not sure.
 [4] BY MR. WISENBERG:
 [5] Q Do you know who Jocelyn Jolley was, or is?
 [6] A Yes.
 [7] Q Can you tell us who?
 [8] A She was also a staff person in leg. affairs --
 [9] legislative affairs.
 [10] Q Was she transferred out around the same time as
 [11] Monica Lewinsky?
 [12] A I think she was.
 [13] Q Do you know why?
 [14] A I think they were trying to redo correspondence --
 [15] legislative correspondence -- congressional correspondence.
 [16] Q Do you know any other reason than that?
 [17] A No.
 [18] BY MR. O'BRIEN:
 [19] Q To gain entrance into the White House --
 [20] Tell me again your name.
 [21] Pat O'Brien.
 [22] A Okay.
 [23] Q To gain entrance into the White House, a person has
 [24] to be waived in, correct?
 [25] A Correct.

Page 80

[1] Q And they provide date of birth.
 [2] Social Security number?
 [3] A Correct.
 [4] Q Are you aware of any mechanism by which the Secret
 [5] Service or somebody in the White House can place a
 [6] designation on somebody -- a do-not-admit designation?
 [7] A Yes. I think so, yes.
 [8] Q And basically, what would that mean?
 [9] A It happens so rarely, I'm not really sure of what
 [10] they did. I knew that there was a way to do it, but I can't
 [11] tell you the mechanics of it.
 [12] Q Okay. But would it mean that person would not be
 [13] able to gain access?
 [14] A To enter the complex, yes.
 [15] Q Are you aware of any attempt to place such a
 [16] do-not-admit designation on Monica Lewinsky?
 [17] A No, I'm not.
 [18] BY MR. WISENBERG:
 [19] Q After you had her transferred out, you didn't ask
 [20] for that to happen?
 [21] A No.
 [22] Q Did you assume that would happen?
 [23] A No. Absolutely not.
 [24] MR. WISENBERG: Okay. I'm going to ask you to step
 [25] outside for just a few moments, and then we'll invite you in,

Page 83

[1] A Oh, yeah.
 [2] Q All right. Nobody was talking to you about
 [3] Monica Lewinsky in the period just before, a month or
 [4] two before --
 [5] A No.
 [6] Q -- she became a more well-known name?
 [7] A No.
 [8] Q Do you recall the reasons for -- you mentioned a
 [9] few other transfers that you accomplished of staffers when
 [10] you were in your position as deputy chief of staff. Do you
 [11] recall the reasons for those transfers?
 [12] A I asked -- one person went into, I think it was
 [13] Betty, and asked if -- and said he wanted to make an
 [14] appointment with the President.
 [15] Q And that was a no-no?
 [16] A Yes, that was a no-no. That was a big no-no
 [17] There was a -- there was one woman -- a young
 [18] woman, an intern, who was very disruptive and clearly
 [19] disturbed. I think we asked her -- we sent her home.
 [20] I can't remember.
 [21] Q Any others than that?
 [22] A Any others, no. I mean, I can sit and think about
 [23] it, but --
 [24] Q Do you know anything about a relationship -- and
 [25] I don't mean sexual -- I mean a relationship between -- a

Page 81

[1] hopefully one last brief time. Is that all right?
 [2] THE WITNESS: Mm-hmm. Thank you.
 [3] (The witness was excused and recalled.)
 [4] FOREPERSON: Ms. Lieberman, I'd like to remind you
 [5] you're still under oath.
 [6] THE WITNESS: Okay. Thank you.
 [7] BY MR. WISENBERG:
 [8] Q Let the record reflect that the witness has
 [9] returned and been reminded that she's under oath.
 [10] You're the same Evelyn Lieberman who has been
 [11] testifying here this afternoon; is that correct?
 [12] A Yes.
 [13] Q The grand jurors have asked that I ask you some
 [14] other questions.
 [15] Let me ask you: After you made the decision to
 [16] transfer out Ms. Lewinsky, did you follow up at all on that
 [17] to see that it had been done?
 [18] A No.
 [19] Q Do you recall how long after you had her
 [20] transferred out, you saw her back over? You've mentioned
 [21] two incidents. Do you remember how long after you had her
 [22] transferred out?
 [23] A No. Because before, you asked me what trip it was,
 [24] and I didn't know.

Page 84

[1] social relationship between Ms. Lewinsky and a steward know-
 [2] by the name of Nel at the White House?
 [3] A A steward?
 [4] Q Yes.
 [5] A No.
 [6] Q [REDACTED]
 [7] [REDACTED]
 [8] [REDACTED]
 [9] A [REDACTED]
 [10] Q Do you remember who she was with?
 [11] A Yes.
 [12] Q Who was that?
 [13] A She was with Peter Strauss, who was a former
 [14] director of the Voice of America.
 [15] Q Is that the --
 [16] A I think he was the former director other of Voice
 [17] of America -- yeah, former director of Voice of America.
 [18] Q Okay. Pardon my ignorance, but is that
 [19] Peter Strauss, the actor, too -- the same one who
 [20] was an actor?
 [21] A Maybe this is aging me, but I don't know an actor
 [22] named Peter Strauss.
 [23] Q Okay. Perhaps there isn't one.
 [24] Can you describe your relationship with
 [25] Betty Currie for the grand jurors.

Page 82

[1] Q Is there any particular reason that when you
 [2] saw Ms. Lewinsky in the West Wing lobby, you went to
 [3] Betty Currie, as opposed to somebody else?
 [4] A That was the question you just asked me
 [5] (indicating).
 [6] No. I just think that that's where I would always
 [7] go. Because as I said, we had -- Betty kind of monitored
 [8] that area, as well.
 [9] Q "That area," referring to --
 [10] A Lobby.
 [11] Q -- west lobby?
 [12] A West lobby, yes.
 [13] Q When you generally make a decision to fire
 [14] or transfer somebody, would you generally run that by
 [15] Mr. Panetta?
 [16] A No.
 [17] Q Do you know or have you heard anything about any
 [18] personal relationship between Ms. Lewinsky and Betty Currie?
 [19] A No.
 [20] Q In response to one of my questions, you mentioned
 [21] something to the effect of, since this matter has come up in
 [22] the last couple of "months." And in fact, this has been news
 [23] more or less in the last couple of weeks.
 [24] A Did I say "months"?
 [25] Q Yes. Was that just a misstatement?

Page 85

[1] A Yes. We worked together every day. I liked
 [2] her very much. I would sometimes come in, and -- she was
 [3] very polite, so when there were staffers -- senior staffers
 [4] included -- who would, after they did their briefing or while
 [5] they were waiting to brief the President, would be loitering
 [6] around. I would kick them out, and she would be grateful. I
 [7] liked her very much.
 [8] Q She would be --
 [9] A I like her very much.
 [10] Q She would not be forceful enough to be able to tell
 [11] them to get out?
 [12] A Yes.
 [13] Q Is she kind of a modest-type person?
 [14] A Yes.
 [15] Q Do you consider her to be truthful?
 [16] A Yes.
 [17] Q Honorable person?
 [18] A Betty?
 [19] Q Yes.
 [20] A Yes.
 [21] Q How did you originally get your job at the
 [22] White House?
 [23] A Maggie Williams, with whom I worked at the
 [24] Children's Defense Fund -- whose boss I was at the
 [25] Children's Defense Fund -- called me and said that Hillary

Page 86

[1] wanted her to be chief of staff -- she thought she was just
 [2] going to work during the campaign. And she said Hillary
 [3] wanted her to be chief of staff, and would I come and be her
 [4] assistant. And I said no. And she said, "Just give me a
 [5] year." And I said, "Okay."
 [6] Q All right. Why didn't you want to do that?
 [7] A It was a \$30,000 cut in salary. It was a
 [8] seven-day-a-week job. It was -- it was -- I knew it
 [9] was going to be a grueling -- a grueling life.
 [10] Q Do you know what, if any, role the First Lady had
 [11] in getting you to come to the White House?
 [12] A I'm not sure what you mean by that.
 [13] Q Do you know if she wanted you there?
 [14] A Oh, yes.
 [15] Q Did she ask Maggie to ask you to come on board?
 [16] A Maggie told her that she was going to ask me.
 [17] Q And the First Lady approved of that?
 [18] A Yes.
 [19] Q You mentioned at one point earlier on that you
 [20] had to be reminded, if I'm not mistaken, in the recent time
 [21] period of Monica Lewinsky's name. But some of the incidences
 [22] you've told us about -- particularly the incident in the west
 [23] lobby, where you went to Betty, and you said you must have
 [24] mentioned her name -- you testified to that also.
 [25] Would it be fair to say that, at least for some

Page 89

[1] CERTIFICATE OF REPORTER
 [2] I, Elizabeth J. Walker, the reporter for the
 [3] United States Attorney's Office, do hereby certify that the
 [4] witness(es) whose testimony appears in the foregoing pages
 [5] was first duly sworn by the foreperson or the deputy
 [6] foreperson of the Grand Jury when there was a full quorum of
 [7] the Grand Jury present; that the testimony of said
 [8] witness(es) was taken by me by stenotype and, thereafter,
 [9] reduced to typewritten form; and that the transcript is a
 [10] true record of the testimony given by said witness(es).

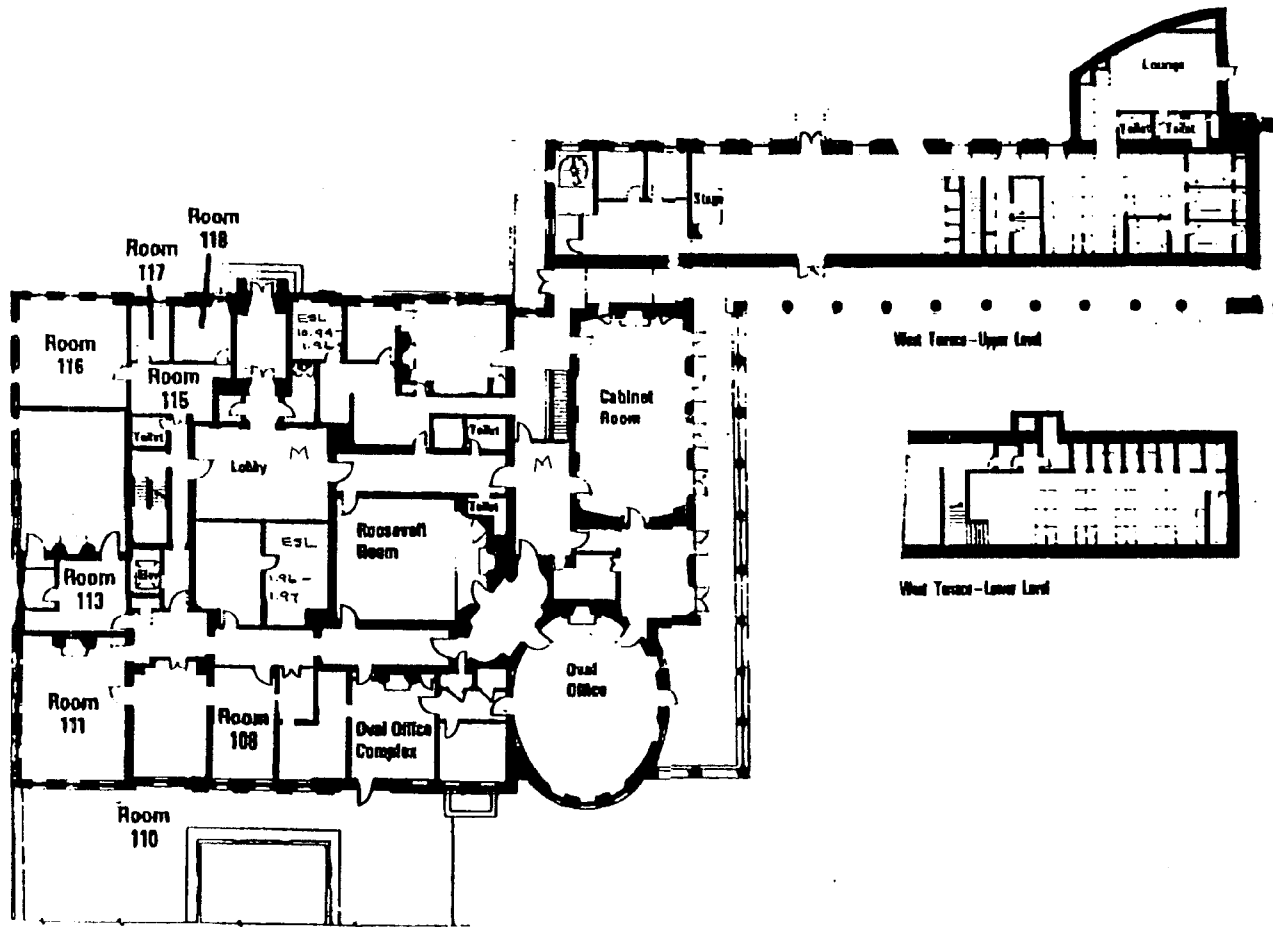
[11]
 [12] Elizabeth J. Walker
 [13] Official Reporter
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Page 87

[1] period of time after you kicked her out, you remembered her
 [2] name -- Monica Lewinsky's name?
 [3] A Oh, I'm sure.
 [4] Q But you did have to be reminded when it came to
 [5] light recently?
 [6] A Yeah, when her mom said to me -- yes.
 [7] Q When this incident became public a couple of weeks
 [8] ago, did you know right away who it was, based on that
 [9] experience you had had with her mother?
 [10] A Did I know right -- no. Based on her photo.
 [11] Q Okay. Do you have any information relevant to our
 [12] inquiry as I read to you at the beginning that you haven't
 [13] told us yet that you can think of?
 [14] A I don't think so.
 [15] MR. WISENBERG: Anything else before I make a final
 [16] statement -- statement/question?
 [17] (No response.)
 [18] BY MR. WISENBERG:
 [19] Q Sometimes, Ms. Lieberman, people who come
 [20] before the Grand Jury -- even people who are questioned for
 [21] several hours, like you are -- when they leave, when they're
 [22] walking down the street, when they're driving in their car,
 [23] something just comes to light that they think of that might
 [24] be inconsistent with what they've said, or they might have
 [25] given an "I don't remember," and now they remember.

Page 88

[1] We would appreciate it, if that happens, if you --
 [2] through your attorney, of course -- would get in touch with
 [3] one of us. Would that be okay?
 [4] A That would be fine.
 [5] Q Has anybody at the White House -- other than
 [6] employees of the White House counsel's office -- spoken to
 [7] you about your testimony today?
 [8] A No.
 [9] MR. WISENBERG: All right. Are there any further
 [10] questions?
 [11] (No response.)
 [12] MR. WISENBERG: May the witness be excused?
 [13] FOREPERSON: Yes, she may.
 [14] THE WITNESS: Thank you.
 [15] MR. WISENBERG: Thank you very much.
 [16] THE WITNESS: Thanks.
 [17] (The witness was excused.)
 [18] (Whereupon, at 4:29 p.m., the taking of the
 [19] testimony in the presence of a full quorum of the Grand Jury
 [20] was concluded.)
 [21] *****
 [22]
 [23]
 [24]
 [25]



2345

