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OFFICE OF THE INDEPENDENT COUNSEL

2/2/98

Date of transcription

JENNIFER L. "JENNA" SHELDON, white female, born [REDACTED] Social Security Account Number [REDACTED] home address [REDACTED], telephone [REDACTED] employed as Manager, Human Resources, Revlon, 625 Madison Avenue, New York City 10023, telephone [REDACTED], was interviewed in the offices of Attorney CHARLES A. STILLMAN of the firm of Stillman & Friedman, 425 Park Avenue, New York City, telephone 212-223-0200. Also present during the interview was JOHN B. HARRIS of the same firm.

After being advised of the personal and official identities of the interviewers and the purpose of the interview, SHELDON provided the following information:

SHELDON first became aware of MONICA LEWINSKY on January 9, 1998, when ALLYN SEIDMAN, Senior Vice President for Corporate Communications, telephoned and requested SHELDON to interview a new applicant. LEWINSKY was brought to SHELDON's office where LEWINSKY filled out an application. SHELDON was aware from LEWINSKY's application that LEWINSKY had been referred to Revlon by JAYME DURMAN, a Vice President at MacAndrews & Forbes Holding Inc. and VERNON JORDAN, a member of MacAndrews & Forbes Board of Directors. SHELDON explained that MacAndrews & Forbes Holding Inc. is the holding company for Revlon.

During the interview that followed, SHELDON asked LEWINSKY how LEWINSKY knew VERNON JORDAN. LEWINSKY said that she was a friend of JORDAN and one day had mentioned to JORDAN that she was interested in the fashion and beauty industry. SHELDON could not now recall what LEWINSKY said about how LEWINSKY came to know JORDAN if LEWINSKY even told her at all.

No offer of employment was made to LEWINSKY the day of the interview. SHELDON later discussed LEWINSKY with SEIDMAN and they decided that LEWINSKY was qualified for a new entry level position of Public Relations Administrator that they had been discussing. The decision was made by SEIDMAN, DURMAN and SHELDON to offer the position to LEWINSKY. LEWINSKY's starting salary of \$40,000 was agreed upon by the three of them based on other recently hired employees' starting salaries.

Investigation on 1/26/98 at New York City, NY File # 29D-LR-35063

by CI [REDACTED] Date dictated 2/2/98

29D-LR-35063

JENNIFER L. "JENNA" SHELDON

1/26/98

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. On _____

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On January 13, 1998, SHELDON telephoned LEWINSKY in Washington, D.C. and a verbal offer of employment was made. LEWINSKY accepted the offer immediately. SHELDON asked LEWINSKY for the names of references and by facsimile received January 14, 1998, LEWINSKY provided the names of KEN BACON and JOHN HILLEY. SHELDON attempted to contact both references but both were unavailable.

SHELDON did not feel undue pressure to hire LEWINSKY even though SHELDON was aware that LEWINSKY had been recommended by officials at MacAndrews & Forbes, Revlon's holding company.

The position offered to LEWINSKY is a newly created position but the company fully intended to fill the position. If not with LEWINSKY, then with someone else within the near future.

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OFFICE OF THE INDEPENDENT COUNSEL

4/1/98

Date of transcription

JENNIFER "JENNA" L. SHELDON is employed as a Manager for Corporate Staffing, Human Resources, REVLON CORPORATON. She was interviewed at the law offices of STILLMAN & FRIEDMAN, P.C., 425 Park Avenue, New York, New York. Present at the time was CHARLES STILLMAN, attorney for MC ANDREW & FORBES HOLDINGS, 35 East 62 Street, New York, New York. Also present were Assistant Independent Counsels THOMAS BIENERT and STEVEN BINHAK. SHELDON provided the following information:

As one of the Managers for Corporate Staffing, SHELDON's duties include recruiting employees for REVLON ranging from the clerical level to the director level. She supervises another person who assists her. Her immediate superior handles the senior executives recruited by the company. SHELDON reports to RICK POGUE, Vice President, Human Resources. The offer of employment made to MONICA LEWINSKY was considered entry level management.

SHELDON first became aware of LEWINSKY on Friday, January 9, 1998 when she received a telephone call from ALLYN SEIDMAN, the head of public relations for REVLON. SEIDMAN said she was interviewing LEWINSKY and that she wanted SHELDON to meet with her thereafter. During the hiring process, an applicant seeking a position in public relations usually meets with three or four persons for assessment. The last person to meet the applicant would be the head of the department, ALLYN SEIDMAN.

SHELDON interviewed LEWINSKY as requested. She asked LEWINSKY who she had already met at the company. LEWINSKY responded she had met JAYMIE DURNAN, ALLYN SEIDMAN, and NANCY RISDON (also in the public relations department). The purpose of the interview was for SHELDON to evaluate LEWINSKY. Prior to the actual interview, SHELDON had not seen LEWINSKY's resume, however was able to look over a copy LEWINSKY brought to the interview by LEWINSKY. SHELDON recalled LEWINSKY saying that she preferred the environment at the Pentagon over that at the White House.

SHELDON explained that as a general rule, Human Resources meets a potential employee first, the opposite of what

Investigation on 3/27/98 at New York, New York File # 29D-OIC-LR-35063

by SA [REDACTED] Date dictated 4/1/98

29D-OIC-LR-35063

JENNIFER L. SHELDON

3/27/98

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, Page _____

happened with LEWINSKY, however she did not find it particularly odd in this case. At REVLON, the different departments try to work as a partnership. SHELDON did allow it was irregular that the Human Resources department would not know about the fact that an applicant was in play for a position at public relations, or any other department.

As she went through the interview process, SHELDON made notes on the applicant's resume. A copy of that resume was provided by CHARLES STILLMAN. A copy containing the notes is attached hereto. During interview, SHELDON was getting a sense of LEWINSKY's experience and abilities.

The overall impression LEWINSKY made was that she was "fine" for employment. SHELDON also thought she was a pleasant person. As they talked, she found it hard to get a fix on where exactly she would fit into the organization. SHELDON had a better idea about that after she spoke with SEIDMAN and heard that SEIDMAN wanted her for her department. On her own, SHELDON had concluded that LEWINSKY was not suited for the Administrative Assistant or Public Relations Assistant.

At the conclusion of the interview, SHELDON escorted LEWINSKY to the elevator bank. Before leaving, LEWINSKY mentioned that VERNON JORDAN had recommended her for employment. She said she was from Washington, D.C. and knew JORDAN. She also said she had an interest in the fashion and cosmetics industry.

Upon returning to her office, SHELDON telephoned SEIDMAN to say the interview was over. In response to SEIDMAN's question as to her evaluation, SHELDON responded LEWINSKY was not qualified for a position. SEIDMAN then suggested a new position being created known as Public Relations Administrator. Such a job had been under discussion at REVLON and SHELDON suggested they needed to talk about the matter further.

The proposed position of Public Relations Administrator was described as assisting with events, processing invoices and other budgetary matters, rallying the troops, and handling other miscellaneous duties. It was described as a junior level position.

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JENNIFER L. SHELDON

3/27/98

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On Monday, January 12, 1998, SHELDON spoke again with SEIDMAN. SEIDMAN thought that an offer to LEWINSKY for the position of Public Relations Administrator should be pursued. SHELDON concluded that such was the final decision. When asked her opinion, SHELDON said LEWINSKY was "fine" for the job.

On Tuesday, January 13, 1998, SHELDON telephoned LEWINSKY to formally offer her the job subject to a satisfactory check with her references. SHELDON said she needed to have her reference information, which was not in hand at that time. LEWINSKY facsimiled the reference information by the end of the business day. LEWINSKY was not employed at the time and therefore, there was not a two week notice period in which to handle some details such as checking references.

SHELDON recalled that she contacted the references either the same day or the next. LEWINSKY's references were not available and not due back until January 23, 1998, so there was a potential delay in the processing.

SHELDON said that under normal circumstances, at least one reference, provided by the applicant, would have been checked by the time a formal offer was extended. The handling of this candidate was faster than normal. SHELDON offered the example of another hire by REVLON, NANCY MIRANDA, which was handled expeditiously.

SHELDON and SEIDMAN had a discussion of the salary which should accompany the offer of employment. They looked at her previous salary and the range of compensation for the position under consideration. They came up with the figure of \$40,000.00 as the salary to offer.

After notifying LEWINSKY of the formal offer, SHELDON called SEIDMAN to advise her the call had been made. She did not discuss the matter with anyone else. There was no further talk about LEWINSKY until the story about her and the President was on the news. She had no further contact with LEWINSKY at any time thereafter.

Jennifer Sheldon, 4/23/98

OIC Deposition

Page 1 to Page 36

CONDENSED TRANSCRIPT AND CONCORDANCE
PREPARED BY:

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

Page 1

[1]
[2]
[3] ----- x
[4] IN RE: GRAND JURY INVESTIGATION :
[5] ----- x
[6]
[7]
[8] DEPOSITION of JENNIFER SHELDON, held at the
[9] offices of Messrs. Stillman, Friedman & Shaw, 425
[10] Park Avenue, New York, New York 10022, on
[11] Thursday, April 23, 1998, commencing at (12:50)
[12] o'clock p.m., before Annette Forbes, a Certified
[13] Shorthand (Stenotype) Reporter and Notary Public
[14] within and for the State of New York.
[15]
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[19]
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[22]
[23]
[24]
[25]

Page 4

[1]
[2] What we are going to try to do is
[3] create as much as possible the experience of being
[4] in front of the grand jury.
[5] Let me explain to you what I mean by
[6] that.
[7] A Okay.
[8] Q The first thing you should know, in
[9] a normal grand jury setting you would have the
[10] grand jurors here, and there would also be a court
[11] reporter who takes everything down, which the
[12] court reporter is doing.
[13] Instead of that, what we are going
[14] to do is create this transcript and bring that and
[15] read it to the grand jury in Washington.
[16] A Okay.
[17] Q Normally in front of a grand jury or
[18] always in front of a grand jury the witness
[19] doesn't have a lawyer. That's why your lawyer is
[20] not present with you in the room today. At the
[21] grand jury, you would have the ability to speak to
[22] your lawyer at any time. I want you to have that
[23] opportunity today.
[24] At any time you like, you may ask to
[25] stop and we will do that immediately, you can go

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[1]
[2] APPEARANCES:
[3] OFFICE OF THE INDEPENDENT COUNSEL
[4] 1001 Pennsylvania Avenue, N.W.
[5] Suite 490 North
[6] Washington, D.C. 20004
[7] BY: THOMAS H. BIENERT, JR., ESQ.
[8] Associate Independent Counsel
[9] STEPHEN BINHAK, ESQ.
[10] Associate Independent Counsel
[11]
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[1]
[2] out and talk to your lawyer outside.
[3] Do you have a lawyer with you here
[4] today?
[5] A Yes.
[6] Q For the record, could you state who
[7] that is?
[8] A Charles Stillman.
[9] Q We are in Charles Stillman's law
[10] office, in fact?
[11] A Yes.
[12] Q As I told you, everything you are
[13] saying is being taken down by the court reporter
[14] and we will read that to the grand jury.
[15] As you may know, in a civil
[16] deposition you would get a copy of your
[17] transcript, you get it, read it, you sign off on
[18] it, adopt it. You will not get a copy of the
[19] transcript today. That's in conjunction with the
[20] rules of grand jury secrecy.
[21] A Would you explain?
[22] Q There are rules of grand jury
[23] secrecy. The bottom line is that Mr. Bienert,
[24] myself and the court reporter, we are going to
[25] adopt those rules as though you are in the grand

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[1]
[2] JENNIFER SHELDON, called as a
[3] witness, having been first duly sworn by
[4] Annette Forbes, a Notary Public of the
[5] State of New York, was examined and
[6] testified as follows:
[7] DIRECT EXAMINATION
[8] BY MR. BINHAK:
[9] Q Good morning. Let me just ask you
[10] to state your name and spell it for the record.
[11] A Jennifer Sheldon, J-e-n-n-i-f-e-r
[12] S-h-e-l-d-o-n.
[13] Q Ms. Sheldon, my name is Steve
[14] Binhak. This is Tom Bienert, Jr. We are
[15] associate independent counsels. We are helping a
[16] grand jury which is sitting in Washington, D.C.
[17] conduct an investigation of possible violations of
[18] Federal law, including obstruction of justice,
[19] perjury and subornation of perjury.
[20] Do you understand that?
[21] A Yes.
[22] Q You are here today as an
[23] accommodation in lieu of having you come down and
[24] appear before the grand jury and disrupting your
[25] day, we are having you here to have a deposition.

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[1]
[2] jury, even though you are not.
[3] What that really boils down to is we
[4] can't go out and tell anybody about what you say
[5] in your testimony, and we won't do that.
[6] You, on the other hand, are not
[7] subject to any rules of secrecy and you can tell
[8] anybody you want what you said today, that's your
[9] business, something you may want to talk about or
[10] discuss with your lawyer. Make your decision, do
[11] what you want.
[12] There are a few exceptions with
[13] regard to grand jury secrecy, there are strict
[14] exceptions to the grand jury secrecy. I want to
[15] describe those to you.
[16] The first one is if there were ever
[17] a trial or any kind of proceeding where you would
[18] testify or even if you didn't, it might be
[19] possible that portions or all of your grand jury
[20] testimony would become part of the record of a
[21] trial.
[22] Do you understand that?
[23] A A trial further from this?
[24] Q Anywhere, any time, in federal or
[25] state court, it is conceivable that there could be

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[1] a trial at some time for some reason as a result
 [2] of this investigation. If that were the case,
 [3] it's possible that some of or all of your
 [4] testimony could become part of the record of that
 [5] trial.
 [6] Do you understand that?
 [7] A Okay.
 [8] Q In addition, the Office of
 [9] Independent Counsel has two types of reporting
 [10] functions. At the end of the investigation, the
 [11] Office of Independent Counsel is required to
 [12] submit a report of what it has done. It's
 [13] conceivable that some of your testimony may appear
 [14] in that report.
 [15] Do you understand that?
 [16] A Yes.
 [17] Q Also, under a limited circumstance,
 [18] the Office of Independent Counsel can be required
 [19] to report to Congress, make a report to Congress.
 [20] If that were the case, it's possible that some or
 [21] all of your testimony would be included in that
 [22] report.
 [23] Do you understand that?
 [24] A Yes.
 [25]

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[1] A Yes, I do.
 [2] Q Is there anything that you don't
 [3] understand about what I have just told you?
 [4] A No.
 [5] Q Do you understand all of your grand
 [6] jury rights and responsibilities as I have told
 [7] you?
 [8] A Yes.
 [9] Q Ms. Sheldon, why don't you tell us
 [10] where you work, what your job title is, what you
 [11] do as part of your job title, a thumbnail sketch
 [12] of your employment.
 [13] A I work at Revlon, the corporate
 [14] headquarters at 658 Madison Avenue. My title is
 [15] manager of corporate staffing.
 [16] I am responsible for recruiting,
 [17] screening, hiring candidates into the organization
 [18] or involved in the promotion process of employees
 [19] who are already existing there for the corporate
 [20] headquarters, and I have been for six years.
 [21] Q As part of your job, have you ever
 [22] heard about or met an individual named Monica
 [23] Lewinsky?
 [24] A Yes, I have.
 [25]

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[1] Q Pretty much the last exception to
 [2] the grand jury secrecy is that Mr. Bienert and I
 [3] work with certain people, FBI agents and other
 [4] attorneys. And those people, we often share
 [5] information from the grand jury with other people
 [6] in our office so that they can conduct their
 [7] responsibilities as part of the investigation.
 [8] And that's, of course, why the court
 [9] reporter, Ms. Forbes is here to listen and record
 [10] the testimony, she serves a function.
 [11] Also, any people that come in
 [12] contact with your testimony, like Ms. Forbes, are
 [13] bound by the rule of grand jury secrecy, so they
 [14] take on all of the responsibility that we have.
 [15] Do you understand that?
 [16] A Yes.
 [17] Q Let me tell you about the Fifth
 [18] Amendment.
 [19] A Okay.
 [20] Q You have the right not to answer any
 [21] question today if you feel that the answer to the
 [22] question may tend to incriminate you in any way.
 [23] Do you understand that?
 [24] A Yes.
 [25]

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[1] Q When did you first hear about or
 [2] meet Monica Lewinsky?
 [3] A On Friday, January 9th.
 [4] Q Is that 1998?
 [5] A 1998.
 [6] Q How did you hear about Ms. Lewinsky
 [7] or meet her?
 [8] A I received a phone call from Allyn
 [9] Seidman, who is the senior vice president of
 [10] Corporate Communications, Public Relations, and
 [11] she had called me, advised me that she had a
 [12] candidate who was, whether in the waiting room or
 [13] in her office, I'm not sure, but she had a
 [14] candidate she wanted me to interview and that she
 [15] would send her upstairs in a matter of an hour or
 [16] so.
 [17] Q Ms. Seidman, she also works for
 [18] Revlon, right?
 [19] A Yes, she does.
 [20] Q When she called you on the phone,
 [21] did she indicate to you that she had already
 [22] interviewed Ms. Lewinsky?
 [23] A Not to my recollection. I just
 [24] remember that there was an applicant there and
 [25]

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[1] Q Also, as I discussed with you
 [2] before, you can leave the room at any time, I just
 [3] looked at the door, you can go outside at any time
 [4] you want to speak to Mr. Stillman, who is your
 [5] lawyer.
 [6] A Okay.
 [7] Q And please tell me if you want to do
 [8] so.
 [9] Also, if I ask you a question you
 [10] don't understand, please tell me you don't
 [11] understand it, I will try my best to give you a
 [12] question that you understand. Okay?
 [13] Do you understand everything I have
 [14] told you?
 [15] A Yes, I do.
 [16] Q Last thing, as I referred to before,
 [17] we are writing everything down, or the grand jury
 [18] reporter here is writing everything down.
 [19] If you were to knowingly lie or make
 [20] a misstatement of a material fact, then you could
 [21] be prosecuted for perjury. And that's a felony.
 [22] It's a federal crime, it's punishable by jail or a
 [23] fine.
 [24] Do you understand that?
 [25]

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[1] when she was done with the Public Relations
 [2] Department, that she would come upstairs to see
 [3] me.
 [4] Q Did you later learn that Ms. Seidman
 [5] actually interviewed Ms. Lewinsky before you?
 [6] A Yes, I did.
 [7] Q How did you learn that?
 [8] A Allyn, through a conversation with
 [9] Allyn Seidman.
 [10] Q Was that after your interview or
 [11] before?
 [12] A After my interview with Monica.
 [13] Q As a general matter, isn't it true
 [14] that normally for a lower level employee, a lower
 [15] level employee would usually interview at Revlon
 [16] Human Resources first and then would move on to
 [17] the department where they might be working?
 [18] A Usually.
 [19] Q When you interviewed Monica
 [20] Lewinsky, did you do that in your office?
 [21] A Yes, I did, in my office.
 [22] Q What was your goal in conducting at
 [23] interview with Monica Lewinsky? What was the
 [24] objective of your meeting with her?
 [25]

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[1] [2] A Really screening her, understanding
[3] what her skills were, what she had accomplished,
[4] what her work experiences were and then assessing
[5] that for any existing needs.
[6] Alyn had two positions in her
[7] department, would she be qualified to perform
[8] either of those, enter either of those roles.
[9] Q Do you happen to remember what those
[10] two positions were?
[11] A Sure. There was an administrative
[12] assistant reporting directly to Alyn Seidman,
[13] which was really to serve as her executive
[14] assistant.
[15] Then there was a public relations
[16] assistant who was responsible for junior level PR
[17] events, really working hand in hand with the
[18] public relations VP, but also providing
[19] administrative support.
[20] Q With that objective in mind, then
[21] you met Ms. Lewinsky?
[22] A Yes.
[23] Q Did you have her resume before you
[24] met her?
[25] A No, it's at the same time.

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[1] [2] She was at the eighth floor
[3] reception area and the receptionist called and let
[4] me know she had completed her application. I went
[5] out and got the application with her resume and
[6] Ms. Lewinsky at the same time and I walked her
[7] into my office.
[8] Q Is it fair to say that you didn't
[9] know before Ms. Seidman called you that you were
[10] going to meet with Ms. Lewinsky that morning?
[11] A That is correct.
[12] Q Was that in the morning or
[13] afternoon?
[14] A It was right on the fringe, between
[15] 12:00 and 12:30. So it was afternoon, I guess.
[16] Q Why don't you describe how your
[17] interview went with Ms. Lewinsky, what you talked
[18] about, what your impressions were.
[19] A Okay. It was very cordial, very
[20] nice. I would say we probably had a very standard
[21] interview. I asked questions, she responded; she
[22] asked questions, I responded.
[23] We went in chronological order
[24] through her resume, from her education into her
[25] work experiences and all the way up to her present

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[1] [2] job. And we talked through each of those.
[3] Q What was your impression?
[4] A Very nice. She, again, responded
[5] very well, she had good communication skills,
[6] seemed very, I don't want to, not energetic, but
[7] very happy, had a smile on her face, very pleasant
[8] to speak with.
[9] Q You told us before that you were
[10] evaluating her against two positions, that was
[11] your objective.
[12] What was your evaluation of Monica
[13] Lewinsky with respect to each of those positions?
[14] A For each of those positions, it was
[15] my evaluation that she was not qualified for
[16] either.
[17] Q Is it fair to say that you thought
[18] she was a perfectly nice individual, might be
[19] qualified to work for the company, but at least as
[20] far as these two positions were concerned, she was
[21] not the right person?
[22] A That is correct.
[23] Q Did you talk to Ms. Seidman after
[24] you had that interview -- well, let me go back one
[25] step more.

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[1] [2] How long did the interview last?
[3] A Forty-five minutes.
[4] Q Is that about average?
[5] A Yes.
[6] Q Did you speak to Ms. Seidman after
[7] you spoke to Monica Lewinsky for that 45 minutes
[8] and made the evaluation that you made?
[9] A Yes.
[10] Q What did you discuss with her?
[11] A After I walked Ms. Lewinsky to the
[12] elevators, said goodbye to her, went back into my
[13] office, I called Alyn, just to let her know I had
[14] wrapped up, had escorted Monica to the elevators
[15] and Alyn probably said what did you think, what's
[16] your evaluation.
[17] I explained to her my reasons why
[18] for the two positions that were available that she
[19] was not qualified. She did not have the skill set
[20] or an experienced enough skill set for either
[21] position at this point in her career.
[22] Q Let me pop back to another question.
[23] During the interview, do you know if
[24] Monica Lewinsky mentioned a gentleman named Vernon
[25] Jordan?

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[1] [2] A Yes, she did.
[3] Q Did you know at the time who Vernon
[4] Jordan was?
[5] A Yes. I am aware that he was on our
[6] board of directors.
[7] Q How did she bring up Vernon Jordan?
[8] A On the application, there is a
[9] little box that you fill out how you were referred
[10] to the organization. And Monica had written
[11] Jaymie Duman's name.
[12] And I asked her how she had come
[13] particularly to Mr. Duman. She had said it was
[14] through her interaction in Washington, that she
[15] had come into contact with Mr. Jordan and that she
[16] had happened to mention to him that she was very
[17] interested in fashion, the retail industry, and
[18] through that connection she got the Revlon
[19] interview.
[20] Q Let me flip now back again to where
[21] we were. That's where you just mentioned you had
[22] a discussion with Ms. Seidman, you had given her
[23] your evaluation that Ms. Lewinsky was not
[24] appropriate for either of the two jobs open.
[25] What was Ms. Seidman's response to

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[1] [2] that?
[3] A She was very understanding.
[4] I think that she listened to my
[5] evaluation and then she had proceeded to say, do
[6] you remember our discussions about having an
[7] administrator type of personnel in our department
[8] and that type of a role, that I have been saying
[9] that I have needed for a while? What do you think
[10] about Monica for that type of a job?
[11] Q What was your response to that?
[12] A It's possible. I needed to know
[13] more information about where she wanted to head
[14] with the administrator's job, but it certainly was
[15] a possibility.
[16] Q How would you describe that job in
[17] terms of was it a junior level job, senior level
[18] job, intermediate?
[19] A A junior. Well, the terminology I
[20] would use to describe it, it would be a junior
[21] level professional job.
[22] Q And that is sort of more toward on
[23] the starter end of an executive position?
[24] A Yes, two to three years of
[25] experience was fine.

Page 19

[1] Q Did you make a decision on that
 [2] during that conversation with Ms. Seidman?
 [3] A No. It was Friday. I wanted to
 [4] leave. So we finished the conversation, wrapped
 [5] up and I went home.
 [6] Q Did you talk to Ms. Seidman again
 [7] about Monica and that position?
 [8] A On the following Monday when we
 [9] returned to the office, to work.
 [10] Q What was the substance of that
 [11] conversation?
 [12] A We talked more about the
 [13] administrator role, what it would be, how it would
 [14] service the department, more of the details, what
 [15] the substance behind the position would be, and if
 [16] that were to be a position where it would fall
 [17] into a ranking, because all positions at Revlon
 [18] are ranked by a grade, on the professional side
 [19] from a grade 1 to a 20, let's say. And so each
 [20] grade is ranked.
 [21] So what we had to do was figure out
 [22] by the skill set that was being required to
 [23] perform the job where it would fit into a ranking
 [24] system.
 [25]

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[1] Q Does that ranking system exist
 [2] primarily because you need to set compensation
 [3] rates?
 [4] A It's compensation, it's skill set
 [5] ranks, it allows people to have career paths, yes.
 [6] Q You did that for this job because it
 [7] was not actually a job that actually existed at
 [8] the company, right?
 [9] A I needed to have some sense of
 [10] foundation before I could say how much to pay for
 [11] it, what do we call it, and officially give it a
 [12] title.
 [13] Q Now, as a result of this second
 [14] conversation with Ms. Seidman, did you come to an
 [15] understanding that you would offer Monica Lewinsky
 [16] a job?
 [17] A I don't believe we came to that
 [18] final understanding until Tuesday.
 [19] Q And how did that ultimate decision
 [20] come to be? Did Ms. Seidman say we want this
 [21] position and we want Monica Lewinsky to fill it or
 [22] was it a conversation, how did that come about?
 [23] A I couldn't say it exactly in those
 [24] terms, but I think that once we had put a
 [25]

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[1] definition to, public relations administrator was
 [2] the title, it was a Grade 2, which was junior to
 [3] anybody she had currently working in her
 [4] department.
 [5] So it did not disrupt any equity if
 [6] you were already on a career path, people who had
 [7] skill sets and experiences performing those jobs,
 [8] and I made the salary recommendation of \$40,000.
 [9] Allyn thought about it. She had
 [10] also wanted to bring in Jaymie Duman from the
 [11] MacAndrews & Forbes organization, so she
 [12] conferenced us in on a phone call.
 [13] And after Allyn had time to think
 [14] about it, that was the way she wanted to go.
 [15] Q Just to be clear, MacAndrews &
 [16] Forbes is a holding company, correct?
 [17] A That is correct.
 [18] Q One of its holdings is Revlon,
 [19] correct?
 [20] A One of them, yes.
 [21] Q That's where you work, at Revlon?
 [22] A Yes.
 [23] Q Jaymie Duman is a gentleman who
 [24] works at MacAndrews & Forbes?
 [25]

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[1] A Right.
 [2] Q So this was a reporting function
 [3] sort of back to the mother ship, if you will?
 [4] A Right.
 [5] Q As a result of that phone call, did
 [6] you all make a decision that day?
 [7] A Yes. I primarily listened in. It
 [8] was really Jaymie and Allyn having a conversation.
 [9] Allyn told Jaymie the details of
 [10] what her intentions were, which was to offer the
 [11] position to Monica as public relations
 [12] administrator at \$40,000, to start as soon as
 [13] possible; as soon as she gave us the date to
 [14] start. Mr. Duman concurred and told us. I went
 [15] ahead.
 [16] Q In the grand scheme of things, would
 [17] you say that this was a relatively quick movement
 [18] through the hiring process?
 [19] A In totality of how long positions
 [20] normally stay open, yes. This was pretty fast.
 [21] Q Who actually communicated the hiring
 [22] decision or the offer, as it were, to Ms.
 [23] Lewinsky?
 [24] A That would be me. I did.
 [25]

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[1] Q How did you do that?
 [2] A Via the telephone.
 [3] Q What did you tell her?
 [4] A I asked for Monica and I identified
 [5] myself. I told her that I had good news, that we
 [6] would like to offer her a position at Revlon.
 [7] I went through the title, the public
 [8] relations administrator, the salary, \$40,000. We
 [9] would like you to start as soon as possible. But
 [10] as part of the hiring process, we also needed
 [11] reference checking, so if she could send me
 [12] references.
 [13] And she probably asked me a question
 [14] or two about the company, just like what are the
 [15] starting hours. And she did ask me is there any
 [16] way she could do more research on the company.
 [17] I gave her our Internet address and
 [18] told her that once she got here, she would have
 [19] certainly access to the annual report, which is
 [20] also out on the web site, as well.
 [21] Q Did she give you some references to
 [22] check?
 [23] A Yes, she did. She faxed them to me
 [24] that day. She faxed over two direct references
 [25]

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[1] that I could call. And after she had given them
 [2] to me, I did place a phone call to them, but both
 [3] of them were out of town.
 [4] I didn't leave messages because it
 [5] was over a week's worth of time until they were
 [6] returning. So I put it aside to call them at a
 [7] later date and time.
 [8] Q Is it fair to say if those
 [9] references worked out, she had been offered a job
 [10] and she understood that if they came back with
 [11] acceptable references, she was going to get the
 [12] job?
 [13] A I don't know what she was thinking,
 [14] but I guess.
 [15] Q Is that what you tried to
 [16] communicate?
 [17] A Yes. That's what I tried to
 [18] communicate, yes.
 [19] Q Did anything happen in between the
 [20] time that you had this conversation with her and
 [21] the time that you got the references?
 [22] Or let me put it this way. Let me
 [23] withdraw that question, ask you another question.
 [24] Did you ever get the references from
 [25]

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her?
 A I got the faxed reference list, but I never spoke to either of the references on the list.
 Q Why not?
 A In my best understanding, it would be that a story was communicated via the media that Ms. Lewinsky was involved in a White House matter.
 Q And as a result of that media story, did someone at either Revlon or MacAndrews & Forbes give you directions on what to do with the application, Monica Lewinsky's application?
 A No. It was handled by authorities beyond me.
 Q Were you ever told not to pursue getting references for her?
 A No. All of my files had been taken, so I wouldn't have had access to them.
 Q So you came to understand that for whatever reason you were not to continue on this project?
 A That is correct.
 MR. BINHAK: I have no

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[1] when would the interview process have begun with
 [2] Ms. Lewis, when would the offer have been made and
 [3] when did she start?
 [4] A I'm sorry, can you repeat that?
 [5] Q When did the interview process with
 [6] Ms. Lewis begin, the one that led to her winding
 [7] up getting this PR administrator's job?
 [8] A We internally posted the position,
 [9] so we had quite a few internal people apply. Ms.
 [10] Lewis is an internal employee who was transferred.
 [11] So we had, to my best recollection, three internal
 [12] employees interview, four applied, but one was not
 [13] qualified.
 [14] Q So Ms. Lewis had been working for
 [15] Revlon for some time?
 [16] A Yes.
 [17] Q When would the position have been
 [18] posted, roughly?
 [19] A If not the last week of February,
 [20] the first week of March. Probably February.
 [21] Q So late February, up until early
 [22] March, the position was posted?
 [23] A It's posted for five days.
 [24] Q Then after the five-day closure of
 [25]

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further questions. Mr. Bienert may.
 BY MR. BIENERT:
 Q Just to follow up on the references, is it accurate that at least typically you would have done one reference check before extending an offer?
 A You try to. Sure, yes.
 Q Did you talk to her about a possible start date?
 A Yes, I did.
 Q Did it sound about right that the start date discussed with her would have been around the 26th of January?
 A It sounds about right, yes, if my recollection is correct.
 Q Whatever date it was, that day or some other, would you have communicated that to Ms. Seidman?
 A Yes, I did. And because at that point in time it had not been completely determined to whom she would have reported. So it was absolutely the most direct way to let the Public Relations Department know she had accepted, she will be starting.

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[1] the posting, you began the interview process?
 [2] A With those internals who applied for
 [3] the position, yes.
 [4] Q Approximately how long after
 [5] interviewing Ms. Lewis was an offer extended?
 [6] A I would say between that time, it
 [7] was probably about a month.
 [8] Q And then I assume she accepted the
 [9] job?
 [10] A Yes. She formally accepted.
 [11] Q And started shortly thereafter?
 [12] A Within probably about a week and a
 [13] half to two weeks switchover, leaving her
 [14] department and coming to the new one.
 [15] Q When Ms. Lewis and the other
 [16] candidate for this job first interviewed, did they
 [17] interview with you or someone in the Human
 [18] Resources Department first?
 [19] A A separate recruiter was involved in
 [20] this process. So I would not be able to answer
 [21] that question.
 [22] Q When you say a separate recruiter,
 [23] what do you mean?
 [24] A A different person who reports to me
 [25]

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I gave that information to Allyn.
 What she choose to do with it or to whomever she was going to be working.
 Q I take it while you don't know if she would report to Allyn Seidman, it was your understanding she would be reporting to somebody within Allyn's department?
 A Absolutely.
 Q The name of her job was PR administrator?
 A Yes.
 Q Has that position been filled?
 A Yes, it has.
 Q When was that job filled?
 A About three weeks ago. The person actually physically started three weeks ago. So it was filled five weeks ago.
 MR. BINHAK: It might have been March?
 A Yes.
 Q What is the name of that person who now has the job?
 A Tracy Lewis.
 Q As best you can tell us date wise,

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[1] was the point person.
 [2] Q But someone within the Human
 [3] Resources Section?
 [4] A Yes.
 [5] Q And then would Ms. Lewis thereafter
 [6] have been interviewed with people like Ms. Seidman
 [7] and others within the Communications Department?
 [8] A Yes.
 [9] But, again, I can't verify if the
 [10] recruiter was first or second in the interview
 [11] slate, because I have not been the one doing it.
 [12] Q Is that sort of the normal
 [13] procedure?
 [14] A With internal employees, it's a
 [15] little bit more varied, only because you might
 [16] know the internal employee, you will say you go
 [17] interview with this executive. I will wrap up with
 [18] you, I follow up with an interview because they
 [19] are already a known entity within the work force.
 [20] So instead of meeting them up front,
 [21] letting them meet the department and wrapping up,
 [22] you would a lot of times, you end up doing the
 [23] wrapup.
 [24] Q Having them meet the department
 [25]

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[1] first then?
 [2] A Then come to you. So with an
 [3] internal employee, it's hard to say there is a
 [4] usual, that it's HR first, then the department
 [5] second.
 [6] Q Who was it who directed you, if
 [7] anyone, to go ahead and post that position?
 [8] A Ailyn, my senior vice president of
 [9] Human Resources, and also our Legal Department.
 [10] Q And who in particular would have
 [11] been the people?
 [12] A Ailyn, Ron Dunbar, who is senior
 [13] vice president, and Chip Nichols, who is our
 [14] general counsel, all confirmed that it was okay to
 [15] go ahead and job post the position. And they so
 [16] advised me to do it.
 [17] Q How typical is it that the Legal
 [18] Department is conferring with you about whether to
 [19] post a position?
 [20] A Sometimes we get into discussions
 [21] about that with the Legal Department.
 [22] We particularly go to them for
 [23] guidance, particularly the employment law group,
 [24] particularly in a case if you have, say, a
 [25]

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[1] reduction of work force and all of a sudden you
 [2] have to post a position in this department that
 [3] just had a huge reduction. So they advise and
 [4] counsel us.
 [5] Sometimes if someone is let go under
 [6] maybe bad circumstances and that you are going to
 [7] post their position, you look to the Law
 [8] Department for guidance on those things.
 [9] So in the past they certainly have
 [10] counseled us on the ramifications of posting or
 [11] not posting a position.
 [12] Q Was this position, the PR
 [13] administrative position, had there been any kind
 [14] of reduction in the work force?
 [15] A No.
 [16] Q So was it in regard to this
 [17] position?
 [18] A No. No. There are times when you
 [19] do use the Legal Department for advising counsel
 [20] on job posting.
 [21] Q And there would be times when,
 [22] because of some other factor, some reduction in
 [23] the work force, it's your view, view of people in
 [24] the department involved that the legal personnel
 [25]

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[1] should weigh it?
 [2] A Yes.
 [3] MR. BIENERT: That's all.
 [4] MR. BINHAK: One quick
 [5] question.
 [6] BY MR. BINHAK:
 [7] Q Is it the policy of Revlon to file
 [8] openings from within, with internal hires?
 [9] A It is the preference that we would
 [10] fill the position from an internal employee first,
 [11] before going to the outside.
 [12] Q So that's why you posted this job
 [13] internally first, right?
 [14] A You have to say yes or no for the
 [15] record.
 [16] Q Could you repeat that question?
 [17] A Yes.
 [18] Q Is that the reason why you posted
 [19] this job?
 [20] A When you say this job --
 [21] Q The PR administrative job.
 [22] After Monica Lewinsky was out of the
 [23] picture, then you posted that job inside, to the
 [24] company, correct?
 [25] A Yes.

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[1] Q That's in accordance with your
 [2] general policy?
 [3] A Yes. Because the position was going
 [4] to be filled.
 [5] Q And then because you filled it with
 [6] an internal person, that job was never externally
 [7] advertised?
 [8] A Never advertised, never sought an
 [9] external candidate for it, right.
 [10] MR. BINHAK: I have no further
 [11] questions.
 [12] MR. BIENERT: Thanks a lot.
 [13] (Whereupon, at 1:15 o'clock
 [14] p.m., the deposition was concluded.)
 [15]
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[1] CERTIFICATE
 [2] STATE OF NEW YORK)
 [3]) ss.
 [4] COUNTY OF NEW YORK)
 [5]
 [6] I, ANNETTE FORBES, a Certified
 [7] Shorthand (Stenotype) Reporter and
 [8] Notary Public of the State of New
 [9] York, do hereby certify that the
 [10] foregoing Deposition, of the witness,
 [11] JENNIFER SHELDON, taken at the time
 [12] and place aforesaid, is a true and
 [13] correct transcription of my shorthand
 [14] notes.
 [15] I further certify that I am
 [16] neither counsel for nor related to any
 [17] party to said action, nor in any wise
 [18] interested in the result or outcome
 [19] thereof.
 [20] IN WITNESS WHEREOF, I have
 [21] hereunto set my hand this 29th day of
 [22] April, 1998.
 [23]
 [24] ANNETTE FORBES, CSR, RPR
 [25]

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