

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

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

VIDEOTAPED ORAL DEPOSITION OF
WILLIAM JEFFERSON CLINTON

ANSWERS AND DEPOSITION OF WILLIAM JEFFERSON
CLINTON, produced as a witness on behalf of the
Plaintiff, taken in the above-styled and -numbered
cause on the 17th day of January, A.D., 1998, at
10:30 a.m., before Denise K. McNamara, Certified
Shorthand Reporter in and for the State of Texas, in
the conference room of Skadden, Arps, Slate, Meagher
& Flom, L.L.P., located at 1440 New York Avenue,
N.W., in the City of Washington, District of
Columbia, in accordance with the Federal Rules of
Civil Procedure.

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Secret Service Agent

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P R O C E E D I N G S

MR. BENNETT: Good morning, Judge. Just a few preliminary matters. We are hoping that we can complete the deposition by three-thirtyish. The President has something at four o'clock he really should attend to. Obviously we're not going to -- we're here to do it as long as you require, but that's a long time.

Your Honor, things have changed a little bit given that you're here, and we intend, the President intends to give full and complete answers as Ms. Jones is entitled to have, and counsel, but we feel that this Court must, where appropriate, require predicates before requiring the President to answer a few, a few kinds of questions or as to certain specific situations.

The Presidency is an important institution, Your Honor, and it is very important that it not be held in disrespect or it be held up to the laughingstock of the world. What makes me feel that I have to say this is last night on ABC News the very confidential deposition held before Judge Mehrige where he in fact said somebody will go to jail if they leak this was reported, and I'd like to submit to the Court the transcript of the Peter Jennings

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1 Show which indicates that ABC's Jackie Judd reports
2 that Kathleen Willey swore under oath in a deposition
3 that against her will the President made sexual
4 advances, and I'd like to make that part of the
5 record, and, Your Honor, as I have said so often in
6 your Court, a lie gets around the world faster than
7 anything, even before the truth gets its boots on,
8 and I have been saying from the very beginning that
9 the gag orders, the power of the courts to control
10 these things are very limited, especially in a case
11 like this, so since this may well be, Your Honor, the
12 only time the President is testifying, we would ask
13 that it, that you give serious consideration, Your
14 Honor, to, on certain matters, decide not to require
15 him to answer if you don't think it would lead to
16 admissible evidence. You cannot protect the
17 President otherwise.

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

1 on, on a variety of shows tomorrow. Fox News Sunday
2 will have the pleasure of Mr. Holmes' presence. Mr.
3 Fisher will be on Face the Nation tomorrow, according
4 to this anyway. Sam and Cokie this week, the old
5 Brinkley show, will have the benefit of lead counsel,
6 Mr. Campbell, and I believe there was one or two
7 others.

8 Your Honor, the only interest the press has
9 on Sunday is what we're doing here today, and while
10 there can be some ambiguity about certain aspects of
11 the gag order, one thing is clear: this deposition
12 is gagged, is confidential. If they all go on this
13 show and don't talk about the deposition, I frankly
14 don't know what they're going to talk about. I have
15 been invited on each of these shows and more. I have
16 refused to go on them. I was troubled to see that
17 Mr. Carville, who was not a spokesman for us in any
18 manner, shape or form, was going on one show. I
19 specifically requested that he not. It is not my
20 intention to go on any of them. I reserve the right
21 if they do go on these shows to rebut in an
22 appropriate fashion.

23 My only point in raising this, Your Honor,
24 is this just underscores the importance of Your Honor
25 keeping restraints and controls on this deposition.

1 Your Honor, other than that, I'll certainly let
2 counsel respond if they choose to, we're prepared to
3 have the President come in and testify.

4 MR. FISHER: I don't know that any response
5 is called for, Your Honor. I'm prepared to respond
6 to any questions you may have.

7 JUDGE WRIGHT: All right. Let me make the
8 ruling. The Court previously, on the record, that is
9 I believe last Monday, spent some time with counsel
10 and did set certain limits on this discovery
11 deposition, and those limits of course will remain.
12 The Plaintiff is entitled to conduct discovery in
13 accordance with Rule 26 and Rule 30 of the Federal
14 Rules of Evidence, excuse me, Federal Rules of Civil
15 Procedure, and the Court is present to facilitate the
16 conduct of this discovery.

17 Certainly in a case like this, there is
18 immense public scrutiny and public interest. The
19 Court has been extremely concerned about the leaks to
20 the press concerning matters such as rulings that are
21 under seal. Some of this information is accurate, of
22 course, some is not accurate. I have repeatedly
23 warned counsel in this matter that should there be
24 any unauthorized breaches of the Court's Protective
25 Order and the Court can trace these breaches to a

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1 source, that sanctions will be in order. This is a
2 civil case. Sanctions can be quite substantial in a
3 civil case.

4 The rules also permit me to issue
5 protective orders to keep discovery matters under
6 seal and to limit discovery should the matter be
7 embarrassing, and I have attempted to do that for
8 both sides in this case as well as for other
9 witnesses, and I will continue to make every effort
10 to do that. Unfortunately, the nature of this case
11 is such that people will be embarrassed. I have
12 never had a sexual harassment case where there was
13 not some embarrassment. I'm not here today to rule
14 on admissibility of evidence, so I doubt that there
15 will be any Rule 403 rulings today. This is
16 discovery, and the limits on discovery have
17 previously been set. I know that Plaintiff's counsel
18 wanted to make an objection to some of those limits,
19 and I certainly will permit that at the appropriate
20 time. It will be easier now to do now that I'm here
21 than it would be otherwise.

22 Likewise, I'm sure Defense Counsel would
23 also like to make some objections and that can be
24 done on the record. I'm going to try to be as fair
25 as I can within the rules of discovery, and even

1 though I'm saying I'm not following the rules of
2 evidence, I have to look to the rules of evidence to
3 determine what might or might not be admissible, but
4 as long as it's reasonably calculated to lead to
5 admissible evidence, that will be standard.

6 Now with respect to all these TV programs
7 and news appearances, it concerns the Court
8 tremendously that following the deposition that
9 Plaintiff's Counsel are going to be on just about
10 every Sunday talk show. Certainly my order will be
11 and has been that if anyone reveals anything
12 whatsoever about this deposition, that it will be in
13 violation of the Protective Order. This includes the
14 questions that were asked, objections that were made,
15 the demeanor of the President, whether he did well,
16 whether he did poorly, how long it lasted, how many
17 people were present, anything whatsoever about the
18 quality of the deposition, how many videographers or
19 stenographers we had, and what we did with the
20 tapes. You may acknowledge that it took place, but
21 that is it. We've already tacitly acknowledged that
22 it's taking place.

23 The previous deposition we had of President
24 Clinton was in a criminal case. I'm fortunate in one
25 regard, even though I'd rather not be here, I have

1 had the privilege of presiding at a deposition of
2 President Clinton at the White House, when was it,
3 the summer of 1996.

4 MR. WARD: July 7th, 1996.

5 JUDGE WRIGHT: And back then the Court
6 instructed everyone in the room, and we had a forest
7 of lawyers in the room, not to discuss this case or
8 the deposition in any form or fashion, and it worked,
9 but I was dealing with a different bunch. The
10 President was a witness, he was not a party. The
11 public interest in this matter is, was certainly not
12 at the height that the public interest is in this
13 matter, and therefore I caution all of you to adhere
14 to the Court's Protective Order and also to what I
15 have just said.

16 It is clear to me that someone is leaking
17 information to people like Matt Grudge, and it
18 concerns me very much that this might jeopardize the
19 Plaintiff's and Defendants' right to a fair trial,
20 and I have said repeatedly that if the Court is not
21 able to select a fair jury, we will not try this
22 case. And if we don't go to trial because of the
23 inability of the Court to find a fair jury, it will
24 actually be to the detriment of Ms. Jones more than
25 it will be to the President, because she is the one

1 who successfully invoked her right to a trial as soon
2 as practicable. The Court, as you know, was willing
3 to put it off until the President was no longer in
4 office, however I was not willing to put off this
5 until he was no longer in office. And so that's it.
6 To the extent that you're asking for limits, other
7 than the ones I've imposed, I'm not going to do it.

8 I have agonized over this case and the very
9 embarrassing nature of some of the issues in this
10 case, and it does not give me pleasure even to be
11 here today to listen to it. However, we're here,
12 I've done it before, I've gotten tougher through this
13 case. What is, what was initially very shocking and
14 embarrassing to the Court is not quite as shocking
15 and embarrassing anymore. I mean, in other words, I
16 just get a little tougher, and what I have said
17 goes. I intend to sanction anyone who is caught
18 violating this order, and I don't know what Judge
19 Mehrige said. I'm not privy --

20 MR. BENNETT: He was pretty tough, he said
21 he'd lock people up and we're going to send a
22 notice --

23 JUDGE WRIGHT: I will say this, I'm not
24 saying I'm going to lock people up, but you know I've
25 done it before.

1 MR. BENNETT: I don't know that, Judge.

2 JUDGE WRIGHT: Oh, but I have done it
3 before.

4 MR. BENNETT: I read about it.

5 JUDGE WRIGHT: I'm doing it right now.

6 MR. BENNETT: Just so it's clear, we're not
7 asking for any new limits. We're just simply asking
8 that you firmly apply the ones that you have already
9 established.

10 JUDGE WRIGHT: All right, and of course
11 we'll be on the record, but another thing I want to
12 say to all lawyers present, I had a visit with both
13 videographers before any lawyer arrived. Both
14 videographers will be making, making the videotapes
15 of this without any script notation of time and
16 minutes, and that's because of splicing. I
17 anticipate that following objections we will want to
18 splice these tapes and put them together, and I don't
19 want any member of the public, should this tape ever
20 be made public, to suggest that something happened,
21 that I overruled or sustained, and then we pasted it
22 together. That will happen, it might be because one
23 of us needs to run down the hall to the restroom. I
24 mean, I just don't like, we're going to have to take
25 breaks, I don't like for the public to suggest things

1 which are not true. I don't like for inferences to
2 be drawn which are not true. Lawyers have a right to
3 object, judges have a right to announce their
4 rulings, and quite frankly, there's no reason for the
5 finder of fact to know the ruling or for that matter
6 the objection, and I'm, I want you to know that I
7 have ruled that way. It will make splicing more
8 difficult.

9 Now, for the stenographer, if you have time
10 things on your, on your transcript that can be
11 deleted in a formal transcript, you may use them,
12 because when it comes time to splice this tape, it
13 will be of help to the people who are editing it, and
14 so it's all right with the Court if you do that, so
15 long as you can take them off for a final transcript,
16 and I think that would be helpful. And other than
17 that, I'm ready for the President.

18 MR. BRISTOW: Your Honor --

19 JUDGE WRIGHT: Oh, sorry.

20 MR. BRISTOW: I am also, as Mr. Bennett,
21 not asking you to impose any limits other than the
22 requests that were made on Monday that we have
23 previously had the colloquies about. However, I am
24 delighted that you are here, and I think that the
25 institution of the Presidency is bigger than Mr.

1 Clinton, is bigger than any of us. And the law, as I
2 understand it, is that in a discovery deposition they
3 can go into relevant evidence and evidence that might
4 lead to the discovery of relevant evidence. I think
5 that Your Honor is perfectly within your rights with
6 general discretion, not to mention the special
7 discretion that the Supreme Court gave you with
8 regard to the Presidency, to look and listen very
9 closely about where the predicate is and, and whether
10 this really is something that should be discussed
11 today. I think that's all Mr. Bennett was saying,
12 and I join that request on behalf of Mr. Ferguson.

13 JUDGE WRIGHT: I will try to be as fair as
14 I can be, but this is discovery, and like it or not,
15 probably some, I'm going to overrule some of your
16 objections so the Plaintiff can find her evidence.

17 Now that doesn't mean that it will ever be
18 out there in a trial, but this is discovery, she's
19 entitled to do it. Usually a party conducts
20 discovery without a Judge sitting there making the
21 ruling on every item, and I'm not going to use the
22 Federal Rules of Evidence, except I have to have them
23 for guidance to determine what might or might not be
24 admissible but --

25 MR. BENNETT: Our objections are going to

1 be quite selective, Your Honor. I'll get the
2 President.

3 (Exhibits 1-5 marked.)

4 (Off-the-record discussion.)

5 MR. BENNETT: Your Honor, may we have the
6 record reflect who is here in the room.

7 JUDGE WRIGHT: Yes, sir, the videographer,
8 Mr. Marsh Flournoy, will I believe state for the
9 record all the people who are present? Is that
10 correct? Are you going to go around the room to do
11 that?

12 MR. FLOURNOY: Actually I was going to go
13 around the room after I introduce.

14 JUDGE WRIGHT: Sure, he's going to do the
15 introduction, and then after he's through I will
16 swear the witness.

17 MR. FLOURNOY: This is the videotaped
18 deposition of President William Jefferson Clinton in
19 the matter of Paula Corbin Jones versus William
20 Jefferson Clinton and Danny Ferguson. Today's date
21 is January 17th, 1998. The time is 10:53 a.m. This
22 deposition is being taken at Skadden, Arps, Slate,
23 Meagher and Flom. The court reporter is Denise
24 McNamara of Discovery Reporting Systems,
25 Incorporated. This deposition is being

1 simultaneously videotaped by Marsh Flourney of
2 Discovery Reporting Systems, Incorporated, and Ray
3 Brown of Ray Brown and Associates.

4 Would Counsel please announce their
5 appearances for the record.

6 MR. BENNETT: Robert Bennett, Your Honor,
7 Counsel for President Clinton.

8 MR. ETTINGER: Mitchell Ettinger for the
9 President, Your Honor.

10 MR. BRISTOW: Bill Bristow representing
11 Danny Ferguson.

12 MS. SABRIN: Amy Sabrin representing the
13 President.

14 MS. SEXTON: Catherine Sexton representing
15 the President.

16 MR. PYKE: David Pyke for the Plaintiff.

17 MR. CAMPBELL: Donovan Campbell
18 representing the Plaintiff.

19 MR. FISHER: Jim Fisher for the Plaintiff.

20 MR. HOLMES: Wes Holmes for the Plaintiff.

21 MR. RADER: Bob Rader for the Plaintiff.

22 MR. WILSON: McCord Wilson for the
23 Plaintiff.

24 MR. RUFF: In addition, let the record
25 reflect that Charles Ruff, Counsel to the President,

1 is present as well.

2 JUDGE WRIGHT: Very well, are you through
3 with the introductory matters?

4 MR. FLOURNOY: Yes, ma'am.

5 WILLIAM JEFFERSON CLINTON,
6 having been first duly sworn to testify the truth,
7 the whole truth and nothing but the truth, testified
8 under oath as follows:

9 P R O C E E D I N G S.

10 MR. FISHER: Your Honor, this morning, I
11 have a number of deposition exhibits. With the
12 Court's permission and Mr. Bennett's permission, may
13 I hand those directly to the President?

14 JUDGE WRIGHT: Mr. Bennett, do you object?

15 MR. BENNETT: I don't object to him handing
16 them but --

17 MR. FISHER: I have a copy for you, Mr.
18 Bennett.

19 MR. BENNETT: Do you have a copy for
20 Mr. Ruff and Mr. Bristow?

21 MR. FISHER: As to most of them I will, but
22 not as to all of them.

23 DIRECT EXAMINATION

24 BY MR. FISHER:

25 Q. Good morning, Mr. President.

1 A. Good morning.

2 Q. My name is Jim Fisher, sir, and I'm an
3 attorney from Dallas, Texas, and I represent the
4 Plaintiff, Paula Jones, in this case. Do you
5 understand who I am and who I'm representing today?

6 A. Yes.

7 Q. And do you understand, sir, that your
8 answers to my questions today are testimony that is
9 being given under oath?

10 A. Yes.

11 Q. And your testimony is subject to the
12 penalty of perjury; do you understand that, sir?

13 A. I do.

14 Q. Sir, I'd like to hand you what has been
15 marked Deposition Exhibit 1. So that the record is
16 clear today, and that we know that we are
17 communicating, this is a definition of a term that
18 will be used in the course of my questioning, and the
> 19 term is "sexual relations." I will inform the Court
20 that the wording of this definition is patterned
> 21 after Federal Rule of Evidence 413. Would you please
22 take whatever time you need to read this definition,
23 because when I use the term "sexual relations," this
24 is what I mean today.

25 MR. BENNETT: Is there a copy for the

1 Court?

2 MR. FISHER: Would you pass that, please?

3 MR. BENNETT: Your Honor, as an
4 introductory matter, I think this could really lead
5 to confusion, and I think it's important that the
6 record be clear. For example, it says, the last
7 line, "contact means intentional touching, directly
8 or through clothing." I mean just for example, one
9 could have a completely innocent shake of the hand,
10 and I don't want this record to reflect -- I think
11 we're here today for Counsel for the Plaintiff to ask
12 the President what he knows about various things,
13 what he did, what he didn't do, but I, I have a real
14 problem with this definition which means all things
15 to all people in this particular context, Your
16 Honor.

17 MR. BRISTOW: Your Honor, I think the
18 wording of that is extremely erroneous. What this,
19 what the deposing attorney should be looking at is
20 exactly what occurred, and he can ask the witness to
21 describe as exactly as possible what occurred, but to
22 use this as an antecedent to his questions, it would
23 put him in a position, if the President admitted
24 shaking hands with someone, then under this truncated
25 deposition -- or definition, he could say or somehow

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1 construe that to mean that that involves some sort of
2 sexual relations, and I think it's very unfair.
3 Frankly I think it's a political trick, and I've told
4 you before how I feel about the political character
5 of what this lawsuit is about.

6 MR. FISHER: Your Honor, may I respond?

7 JUDGE WRIGHT: You may.

8 MR. FISHER: The purpose of this is to
9 avoid everything that they have expressed concern
10 about. It is to allow us to be discreet and to make
11 the record crystal clear. There is absolutely no way
12 that this could ever be construed to include a
13 shaking of the hand.

14 MR. BENNETT: Well, Mr. Fisher, let me
15 refer you to paragraph two. It says "contact between
16 any part of the person's body or an object and the
17 genitals or anus of another person."

18 What if the President patted me and
19 had to lose ten pounds off my bottom? I --
20 be arguing that I had sexual relations with
21 Your Honor, this is going to lead to confusi
22 don't they ask the President what he did, wh
23 didn't do, and then we can argue in Court la
24 what it means. 

25 JUDGE WRIGHT: All right, let me make a

1 ruling on this. It appears that this really is not
2 the definition of contact under Rule 413 because Rule
> 3 413 deals with nonconsensual contact. This
> 4 definition would encompass contact that is
> 5 consensual, and of course the Court has ruled that
6 some consensual contact is relevant in this case, and
7 so let the record reflect that the Court disagrees
8 with counsel that this is not, about it being the
9 definition under Rule 413. It's not. It is more in
10 keeping with, however, the Court's previous rules,
11 but I certainly agree with the President's Counsel
12 that this, the definition number two is too
13 encompassing, it's too broad, and so is definition
14 number three. Definition number one encompasses
15 intent, and so that would be, but numbers two and
16 three is just, are just too broad.

17 MR. FISHER: All right, Your Honor.

18 JUDGE WRIGHT: And number one is not too
19 broad, however, so I'll let you use that definition
20 as long as we understand that that's not Rule 413,
21 it's just the rule that would apply in this case to
22 intentional sexual contact.

23 MR. FISHER: Yes, Your Honor, and had I
24 been allowed to develop this further, everyone would
> 25 have seen that Deposition Exhibit 2 is actually the

1 definition of sexual assault or offensive sexual
2 assault, which is the term in Rule 413.

3 MR. BENNETT: Your Honor, I object to this
4 record being filled with these kinds of things. This
5 is going to leak. Why don't they ask -- they have
6 got the President of the United States in this room
7 for several hours. Why don't they ask him questions
8 about what happened or didn't happen?

> 9 JUDGE WRIGHT: I will permit him to refer to
10 definition number one, which encompasses knowing and
11 intentional sexual contact for the purpose of
12 arousing or gratifying sexual desire. I'll permit
13 that. Go ahead.

14 Q. All right, Mr. President, in light of the
15 Court's ruling, you may consider subparts two and
16 three of Deposition Exhibit 1 to be stricken, and so
17 when in my questions I use the term "sexual
18 relations," sir, I'm talking only about part one in
19 the definition of the body. Do you understand that,
20 sir?

21 A. I do.

22 Q. I'm now handing you what has been marked
23 Deposition Exhibit 2. Please take whatever time you
24 need to read Deposition Exhibit 2.

25 MR. BENNETT: Your Honor, again, what I am

1 very worried about, Your Honor, is first of all,
2 this, this, this appears to be a -- I mean what I
3 don't want to do is have him being asked questions
4 and then we don't, we're all ships passing in the
5 night. They're thinking of one thing, he's thinking
6 of another. Are we talking criminal assault? I mean
7 this is not what a deposition is for, Your Honor. He
8 can ask the President, what did you do? He can ask
9 him specifically in certain instances what he did,
10 and isn't that what this deposition is for? It's not
11 to sort of lay a trap for him, and I'm going to
12 object to the President answering and having to
13 remember what's on this whole sheet of paper, and I
14 just don't think it's fair. It's going to lend to
15 confusion.

16 JUDGE WRIGHT: All right, do you agree with
17 Mr. Bennett?

18 MR. BRISTOW: I had one other point to add,
19 Your Honor.

20 JUDGE WRIGHT: All right.

21 MR. BRISTOW: This is almost like in a
22 typical automobile accident where the plaintiff's
23 counsel wants to ask the defendant were you
24 negligent. That's not factual.

25 JUDGE WRIGHT: Mr. Fisher, do you have a

1 response?

2 MR. FISHER: Yes, Your Honor. What I'm
3 trying to do is avoid having to ask the President a
4 number of very salacious questions and to make this
5 as discreet as possible. This definition, I think
> 6 the Court will find, is taken directly from Rule 413,
> 7 which I believe President Clinton signed into law,
8 with the exception that I have narrowed subpart one
9 to a particular section, which would ~~be~~ covered by
10 Rule 413, and I have that section here to give the
11 President so that there is no question what is
12 intended. This will eliminate confusion, not cause
13 it.

14 MR. BENNETT: Your Honor, I have no
15 objection where the appropriate predicates are made
16 for them to ask the President, did you know X, yes or
17 no, what happened, what did you do, what didn't you
18 do. We are -- we acknowledge that some embarrassing
19 questions will be asked, but then we all will know
20 what we're talking about, but I do not want my client
21 answering questions not understanding exactly what
22 these folks are talking about.

23 Now, Your Honor, I told you that the
24 President has a meeting at four o'clock, and we've
25 already wasted twenty minutes, and Mr. Fisher has yet

1 to ask his first factual question.

2 JUDGE WRIGHT: Well, I'm prepared to rule,
>3 and I will not permit this definition to be
4 understood. Quite frankly there's several reasons.
5 One is that the Court heretofore has not proceeded
6 using these definitions. We have used, we've made
7 numerous rulings or the Court has made numerous
8 rulings in this case without specific reference to
9 these definitions, and so if you want to know the
10 truth, I don't know them very well. I would find it
11 difficult to make rulings, and Mr. Bennett has made
12 clear that he acknowledges that embarrassing
13 questions will be asked, and if this is in fact an
14 effort on, on the part of Plaintiff's Counsel to
15 avoid using sexual terms and avoid going into great
16 detail about what might or might not have occurred,
17 then there's no need to worry about that, you may go
18 into the detail.

19 MR. BENNETT: If the predicates are met, we
20 have no objection to the detail.

21 MR. FISHER: Thank you, Your Honor.

22 JUDGE WRIGHT: It's just going to make it
23 very difficult for me to rule, if you want to know
24 the truth, and I'm not sure Mr. Clinton knows all
25 these definitions, anyway.

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1 Q. Mr. Clinton, do you know a woman named
> 2 Kathleen Willey?

3 A. I do.

4 Q. When did you meet her for the first time?

5 A. I believe in the presidential campaign of
6 1992 in Virginia.

7 Q. She was married to a man named Edward E.
8 Willey, Jr., before he passed away, correct?

9 A. That's right.

10 Q. And she and her husband donated money to
11 your presidential campaign in 1992, correct?

12 A. That's correct.

13 Q. And Kathleen Willey and her husband also
14 did some fund-raising work for your campaign,
15 correct?

16 A. I believe that's right. I'm not sure, but
17 I think they did.

18 Q. If she were to describe herself as a
19 democratic party activist, would you disagree with
20 that characterization of her?

21 A. No, I believe she actually was working very
22 closely with Governor Wilder in Virginia in 1992 at
23 the time I was running for president.

24 Q. All right, sir. On election night in
25 November 1992, did Kathleen Willey and her husband

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1 travel to Little Rock, Arkansas?

2 A. I have no idea.

3 Q. You don't recall seeing them in Little Rock
4 that night?

5 A. No. But, you know, we stayed up late and
6 there were hundreds, thousands of people there. I
7 don't know whether they were there or not.

8 Q. Do you recall that after the election you
9 personally called Kathleen Willey and to thank her
10 for helping you to be elected President?

11 A. No, I don't remember that.

12 Q. After you became President, she got a job
13 working in the White House, correct?

14 A. I believe she worked in the social office.
15 I seem to remember she started as a volunteer. I'm
16 not sure, but I think she was a volunteer.

17 Q. All right, sir. Do you recall that she was
18 living in Richmond, Virginia at that time and
19 commuting all the way to Washington?

20 A. Yeah, I knew that she and Ed lived in
21 Richmond.

22 Q. Do you recall approximately when she was
23 working in the White House as a volunteer?

24 A. No. I don't even -- I don't know how many
25 days a week she worked and what hours she worked.

1 Q. Have you read any part of the deposition
2 testimony given by Kathleen Willey in this case?

> 3 A. No, but I have seen a summary of it.

4 Q. All right, sir. Let me hand you what has
5 been marked Deposition Exhibit 3. I would like to
6 direct your attention to subpart (b), which is about
7 halfway down on the first page. This I will
8 represent to you is a copy of Section 2244 and
9 Section 2245 of Title 18 of the United States Code.

10 MR. BENNETT: Excuse me, Your Honor. I
11 must object. This is a civil section harassment
12 case, and he has handed the President a criminal
13 statute.

14 JUDGE WRIGHT: Sustained.

> 15 Q. Mr. President, did Kathleen Willey ever
16 give you permission to touch her breasts?

> 17 A. No, I never asked, and I never did.

18 Q. Did she ever give you permission to kiss
19 her on the lips?

20 A. No.

> 21 Q. Did you ever attempt to kiss her on the
22 lips?

> 23 A. No.

> 24 Q. Did you ever attempt to touch her breasts?

> 25 A. No.

>1 Q. Did Kathleen Willey ever give you
2 permission to take her hand and place it on your
3 genitals?

>4 A. No, she didn't.

>5 Q. Did you at any time have any form of sexual
6 relations with Kathleen Willey?

>7 A. No, I didn't.

8 Q. Do you recall, sir, that you met with
9 Kathleen Willey at or near the time of her husband's
10 death?

11 A. The meeting I recall occurred before her
12 husband's death. She had requested, my recollection
13 is that she requested several times to come in to see
14 me. She wanted to come in and see me, and she kept
15 asking to do that.

16 MR. BENNETT: Mr. President, just answer
17 his questions, please, sir.

>18 A. And my -- and she did come in to see me.

19 Q. Do you recall whether that particular
20 meeting you just described was before or after her
21 husband's death?

22 A. That was before her husband's death.

23 Q. All right, sir. What, if anything, do you
24 recall being said in that meeting?

>25 A. Well, my recollection is that she, that

1 originally she wanted to come in to talk about moving
2 out of the social office where she was not happy, but
3 when she came in -- that's what I had been told the
4 meeting was about. But when she came in, she said
5 that, and she also said that she probably needed a
6 paying job, but she was, she was very upset that day,
7 I remember this very well, and she didn't stay long,
8 but she was quite agitated, and that was the only
9 meeting I had had with her, and she said that she was
10 faced, she was afraid that they, she'd have to
11 contribute to the family income, and she wanted a
12 job.

13 Q. All right, sir. If she testified that that
14 meeting occurred at about three o'clock in the
15 afternoon, would you have any different
16 recollection?

17 A. I don't have -- I don't remember what time
18 of day it occurred. I just remember she came in and
19 stayed a few minutes and talked to me about her
20 problems.

>21 Q. Was anyone else present in the room while
22 you were talking to her?

>23 A. I don't think so, no.

24 Q. And was this conversation in the Oval
25 Office?

1 A. I think it was partly in the Oval Office
2 and partly in the dining room I have in the back,
3 which is -- my memory is she was quite upset, I asked
4 her if she wanted something to drink, she said she
>5 did, we went back there, she got something to drink,
6 I got something to drink, and I let her sit down at
7 the table in the dining room, and that, and we talked
8 a little there. I can't remember how much time we
9 spent at which place, but she wasn't there very long.

10 Q. Is there a hallway leading from the Oval
11 Office to this private dining room?

12 A. Yes. It's very short. It's probably
13 twelve, fifteen feet long.

14 Q. How wide is it?

15 A. Not wide.

16 Q. What did you have to drink?

17 A. I don't remember.

>18 Q. Was it alcoholic?

>19 A. Oh, no, no, I don't serve alcohol there in
20 the office of the White House.

21 Q. Not ever?

22 A. Never.

23 Q. Did she tell you that she and her husband
24 had some large debts to pay?

25 A. I don't remember that. What I remember is

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1 that she was very -- she was obviously agitated, and
2 I'd never really had a conversation with her before
3 so I, you know, except in public I'd see her, and she
4 always seemed sort of shy, you know, upbeat,
5 positive, but this day she was clearly concerned, but
6 I don't remember going into any great detail. What I
7 remember her saying is that her family, that there
8 was some family financial issues she had to deal
9 with, and she needed to earn some money to work
10 there, and I had, I don't remember her going into any
11 great detail about it. I don't think she stayed long
12 enough to go into any great detail, but she was
13 clearly upset.

14 Q. Do you recall, sir, that she said that one
15 reason she was upset was that her husband was
16 missing?

17 A. No. I didn't know anything about her
18 husband being missing until I learned that, that he
19 was dead.

20 Q. Do you recall how many days passed before
21 you learned that he had passed away?

22 A. I don't. I don't think it was very long,
23 but I don't remember.

24 Q. She took a leave of absence after her
25 husband died, correct?

1 A. I don't know what she did. When I heard
2 that he was dead and that apparently killed himself,
3 I called her and expressed my condolences and said
4 that she should take whatever time she needed. It
5 was a brief call, but I remember that call and I
6 don't know exactly what she did, when she came back,
7 or what the other facts are.

8 Q. Do you recall telling anyone in the White
9 House that as soon as she did come back you wanted to
10 meet with her?

11 A. No, but I, I might well have said something
12 like that, I mean when something that traumatic
13 happens in someone's family, I might have wanted to
14 say something. I just had one of my speech writer's
15 wife just had a stroke. When he came back to work I
16 said something to him. I might have done it, but I
17 don't remember.

18 Q. So if someone in the White House testified
19 that you told them you wanted to see Kathleen Willey
20 as soon as she returned from her bereavement, you
21 wouldn't find that to be implausible testimony?

22 A. It might well have happened. I just don't
23 remember.

> 24 Q. All right. Having read a summary of her
25 testimony, are you aware that she has testified that

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1 you kissed her in the hallway between the Oval Office
2 and the private kitchen?

3 A. I am aware of that.

4 Q. And you're aware that she testified that
5 you took her hand and put it on your penis?

6 A. I'm aware of that.

7 Q. All right, and you deny that testimony?

>8 A. I emphatically deny it. It did not
9 happen.

10 Q. Do you know why she would tell a story like
11 that if it weren't true?

12 A. No, sir, I don't. I don't know. She'd
>13 been through a lot, and apparently the, the financial
14 difficulties were even greater than she thought they
15 were at that time she talked to me. Her husband
16 killed himself, she's been through a terrible time.
17 I have -- I can't say. All I can tell you is, in the
18 first place, when she came to see me she was clearly
19 upset. I did to her what I have done to scores and
20 scores of men and women who have worked for me or
>21 been my friends over the years. I embraced her, I
>22 put my arms around her, I may have even kissed her on
>23 the forehead. There was nothing sexual about it. I
24 was trying to help her calm down and trying to
25 reassure her. She was in difficult condition. But I

1 have no idea why she said what she did, or whether
2 she now believes that actually happened. She's been
3 through a terrible, terrible time in her life, and I
>4 have nothing else to say. I don't want to speculate
>5 about it.

6 Q. Has she ever asked you to pay her money in
7 return for her not disclosing this story?

8 A. Not to my knowledge.

9 Q. Has anyone purporting to speak on her
10 behalf ever asked you to pay money to keep this
11 quiet?

12 A. Not to my knowledge.

>13 Q. Do you recall at any time in that meeting
14 with Kathleen Willey saying to her, "I wanted to do
15 that for a long time"?

>16 A. No, sir. Let me remind you, Kathleen
17 Willey asked for this meeting with me. I didn't ask
18 for the meeting with her. I didn't say anything like
19 that.

20 Q. Do you recall meeting with her again in the
21 Oval Office after she returned from her bereavement?

22 A. I remember that, it seems to me that she
23 came in there once with a friend of hers who was
24 sick, who had cancer, and we had a picture taken. I
25 think you have a copy of that picture. She, she may

1 have come in and said good-bye briefly and had
2 another picture taken when she left, but that's all I
3 remember.

4 Q. All right. Do you recall any conversation
5 with her about obtaining a paying job after she
6 returned from her absence?

7 A. I don't.

8 Q. I'm talking about the absence caused by her
9 husband's death?

10 A. I understand. No, I don't. I don't know
11 if one occurred. I don't remember one.

>12 Q. You do recall, though, that at some point
13 she did receive a job that was a paid position in the
14 White House?

15 A. Yes, I believe that she went to work in the
16 counsel's office.

17 Q. What was the process by which she received
18 that job?

19 A. I don't know the answer to that. After she
20 came to see me, and she was, as I said, clearly quite
21 agitated, when she walked out I said to someone,
22 maybe it was Nancy Hernreich was there who knew
23 her --

24 MR. BENNETT: Keep your voice up, Mr.
25 President.

1 A. Maybe it was Nancy Hernreich who was there
2 and who knew her, perhaps it was someone else, that
3 we ought to see if we could do something for her, and
4 that's all I heard about it. I don't think I was
5 notified when she got the job at the counsel's
6 office, and I'm not aware of what she did there
7 exactly, but I know that she did get a job in the
8 counsel's office, which she held for some period of
9 time.

10 Q. Who in the White House would be responsible
11 for receiving applications for that job and making
12 the decision who would receive it?

13 A. I'm not sure. The -- Bob Nash runs the
14 appointments operation, but I'm not sure that it
15 would have gone to him. It might have gone to the
16 person, might have gone to someone in the
17 administrative line, like a deputy chief of staff or
18 someone like that. I really don't know. Perhaps we
19 can find out for you, but I just don't know.

20 Q. Is Mr. Nash's title Director of
21 Presidential Personnel?

22 A. I don't think so. I think his title is
23 Director of Appointments. I honestly don't know what
24 his direct title is, but when I deal with him we're
25 dealing with appointments to boards and commissions

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1 and things like that.

2 Q. All right.

3 A. Ambassadorships, cabinet, subcabinet.

> 4 Q. Now, you appointed Kathleen Willey to
5 travel to Copenhagen to serve on the official
6 delegation of the United States of America at a world
7 summit for social development, true?

8 A. She went as a White House appointee. I'm
9 not sure I knew in advance of her going, that she was
10 on the delegation. I don't believe I did. But I
11 don't have any reason to know one way or the other.
12 I'm not sure I knew who was on that delegation.

13 Q. She did in fact attend that world summit in
14 March of 1995, correct?

15 A. I don't know if she did, but it, it, if
16 that's what the record reflects, then she did.

17 Q. And then --

> 18 A. I have no direct knowledge of that. I
19 don't remember who went for the United States.

> 20 Q. Was she appointed to serve on the official
21 delegation of the United States of America at a
22 convention on biological diversity in Jakarta,
23 Indonesia?

> 24 A. I don't have any direct knowledge of that.
25 Since, in preparing for this deposition I have been

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1 informed that she was, but I don't believe that I
2 knew about it at the time she went.

3 Q. Do you know who made the decision to place
4 her on that delegation?

5 A. I don't. She had -- was this after she had
6 left the White House?

7 Q. Yes, sir.

8 A. She had friends in the White House who may
9 well have recommended her for it. I don't believe
10 that I did, but I just, I don't know anything about
11 that.

12 Q. Can you shed any light on the process by
13 which she was selected to serve on the delegation?

14 A. No. I'm sure there's someone in the White
15 House who put that delegation together who could do
16 so, but I can't. I don't know.

17 Q. If you wanted to find out the answer to
18 that question, who would you go ask?

19 A. I would go ask either the, probably my
20 deputy chief of staff, John Podesta, to find out. If
21 it was a foreign trip, perhaps the, Mr. Nash.
22 Perhaps the person who does our environmental work,
23 Katie McGinney, I don't know. But I have no idea how
24 that particular delegation was put together.

25 Q. Are you aware that she was appointed to a

>1 position on the Board of Governors of the United
2 Service Organizations, Inc., also known as USO?

>3 A. I am now. When I was told about her, I did
4 not remember appointing her, but that was a direct
5 presidential appointment, so I assume at some point
6 that I actually checked a piece of paper which had
7 her name on it, perhaps some others, but I didn't
8 remember it at the time until I learned it.

9 Q. That position on that USC Board of
10 Governors has a three year term, does it not?

11 A. I don't know.

12 Q. What are Kathleen Willey's qualifications
13 for that position?

14 A. I don't know. I make hundreds of those
15 appointments, and all those recommendations are put
16 together by Mr. Nash. If I wanted to know why he
17 was -- literally in ninety percent, perhaps more, of
18 the cases of all presidential appointments, they're
19 sent to me on a piece of paper which says here's the
20 appointment, here's the name of the person, and
21 there's a brief description of the position, and who
22 has recommended the person, and then accept or
23 reject, and ninety percent of the time I just get the
24 files and I look at the position and I check it off
25 and go on, unless it's something that I know

1 something about or care a great deal about. I just
2 trust the staff to handle it, so I would have no idea
3 why she was recommended or why she was appointed.

> 4 Q. Well, you would not check off someone's
5 name approving the appointment if you had some reason
6 to question the trustworthiness of the individual,
7 would you?

> 8 A. No.

9 Q. And to your knowledge, did Kathleen Willey
10 have a reputation while working in the White House
11 with respect to her character for truthfulness?

12 A. I have no idea what her reputation was
13 among the people who worked with her, one way or the
14 other. I just don't know.

> 15 Q. Did you ever form an opinion as to her
16 character for truthfulness?

> 17 A. No. I only, you know, the only thing that,
18 the only conversation I ever had with her that
19 amounted to anything was this conversation which
20 lasted I think about ten minutes, maybe a little
21 more, and I didn't doubt that she was telling the
22 truth about what she was talking about, but I didn't
23 know her well enough to draw a final, a conclusion
24 about whether she was generally truthful or not.

25 Q. Was that the first conversation that you

1 ever had with her?

2 A. I think it was the first -- I mean I had
3 talked to her in passing, you know. She was, as I
4 said, she was in Virginia when I was there in the
5 campaign, and I'd had conversations with her, but
6 that's the first time I'd ever actually sat and
7 talked with her, to the best of my knowledge. She
8 was around when we did the presidential debate in
9 Richmond. She was around that, you know, working in
10 that, and I would talk to her, and she was always
11 very friendly and very nice, but that conversation, I
12 remember this conversation very vividly because she
13 was so agitated and she seemed to be in very
14 difficult straits.

15 Q. But you don't remember any earlier
16 conversation other than just casual conversation?

17 A. Yeah, I'm sure I had casual conversation
18 with her. I knew who she was and she was always
19 there when we were there in Virginia.

20 Q. Let me hand you what has been marked
21 Deposition Exhibit 5.

22 MR. FISHER: I'm afraid I only have one
23 extra copy of this one, but if you'll send it back to
24 me, you can look at that copy.

25 MR. BENNETT: Do you have a copy for the

1 Judge?

2 MR. FISHER: No, but I'll send that one
3 down after I ask only one or two questions. If you
4 have an objection so that she needs to see it, I'll
5 pass that down.

6 MR. BENNETT: I could make a suggestion.
7 If you have a series of documents you're going to be
8 questioning about, out of courtesy to the other
9 lawyers and the Court, I would be happy to take those
10 and reproduce them so there's enough copies for
11 everyone.

12 MR. FISHER: I think there are only one or
13 two letters for which I only have one copy.

14 JUDGE WRIGHT: Why don't we take him up on
15 his offer and make a copy for the Court and one for
16 Mr. Ruff and I'd, I don't know who else. Mr. Bristow
17 might like to have a copy.

18 MR. BENNETT: Could you give me, maybe you
19 could go on to another area or some direct questions
20 to the President, and give me everything that you
21 want copied, and I'll have several copies made.

22 JUDGE WRIGHT: Actually you can give them
23 to Barry Ward, if you don't want Mr. Bennett to see
24 them until you present them, and so you don't mind if
25 Barry takes them?

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1 MR. BENNETT: No, Your Honor, I'm just
2 trying to expedite things.

3 JUDGE WRIGHT: Sure.

4 MR. FISHER: The things that I have only
5 one copy of are things that were produced just in the
6 last day or so, and with travel arrangements here and
7 everything, I had a hard time coordinating that.

8 THE WITNESS: I know what this document is.

9 MR. BENNETT: Wait until he asks you a
10 question.

11 MR. FISHER: At the next break I'll do
12 that.

13 JUDGE WRIGHT: All right.

14 MR. BENNETT: Okay, fine. Okay. What's
15 your question to the President?

16 MR. FISHER: Did you have an objection
17 about this particular --

18 MR. BENNETT: No, I don't have an
19 objection.

> 20 Q. Is this a copy of a Sexual Harassment
21 Policy that you signed when you were the Governor of
22 the State of Arkansas?

> 23 A. It is. I signed it in 1987, and I'm fairly
24 sure that I was, we were the first or one of the very
25 first states to actually have a clearly defined

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1 sexual harassment policy.

2 MR. FISHER: Objection, nonresponsive
3 beginning with the words, "I'm fairly sure."

> 4 Q. Mr. President, the criteria there under
5 Roman Numeral III were actually Federal Guidelines
6 that you were adopting as the policy in the state,
7 correct?

8 A. Yes.

9 MR. BENNETT: Well, Mr. President, read, if
10 he's going to ask you about little pieces of that,
11 read the document, please.

12 A. Roman Numeral III, it says that the
13 criteria as specified by the Federal Guidelines is,
14 so assuming that, that the staff person I had do this
15 up accurately, that's correct.

16 Q. And after you became President, did you
17 ever come to believe that the Federal Guidelines were
18 any different after you became President than they
19 were at the time you signed this policy?

20 MR. BRISTOW: Your Honor, I'm going to
21 object to this. Is this a question of law, is this
22 like a, some sort of law school exam? It's supposed
23 to be to find factual evidence or factual evidence
24 that will lead to the discovery of other relevant
25 factual evidence. To ask this witness, even though

1 he is a lawyer, do you think that the federal
2 guidelines or the federal law is the same as this
3 state law, that's unfair. I object.

4 JUDGE WRIGHT: Overruled. The President
5 has testified that he signed this, he was familiar
6 with it, and the case concerns alleged activity when
7 he was Governor, and this is a cause of action under
8 Section 1983 and 1985 and that is state action, and I
9 think it is relevant what the Governor knew about the
10 state's sexual harassment policy, or it could be
11 relevant.

12 MR. BRISTOW: I'm not objecting to the
13 question about the sexual harassment policy. I
14 understood the question to be that he wants to
15 compare present federal law with the state law that
16 was in Arkansas when he was governor, and I think
17 that is an academic exercise. It's not a discovery
18 issue.

19 JUDGE WRIGHT: I misunderstood the
20 question, then.

21 MR. BENNETT: Your Honor, my view of this
22 is, if Mr. Fisher wants to use his time with the
23 President of the United States to ask these kinds of
24 questions, I personally have no objection. But at
25 three o'clock, I don't want to hear that we have ten

1 major integral areas that you haven't gone

2 JUDGE WRIGHT: All right, Mr., Mr. Fisher,
3 state the question again. I just, I misunderstood
4 it, apparently.

5 MR. FISHER: The question, Your Honor, is
6 whether he ever came to the understanding that any of
7 these guidelines had changed.

8 JUDGE WRIGHT: Well, you may ask, go
9 ahead.

10 A. I don't think that question ever crossed my
11 mind one way or the other. I have no knowledge of,
12 that there has been any change in the federal law.
13 If there has been, if there hasn't been, I have no
14 knowledge of that.

15 Q. Now, do you know a woman named Monica
16 Lewinsky?

17 A. I do.

18 Q. How do you know her?

19 A. She worked in the White House for a while,
20 first as an intern, and then in, as the, in the
21 legislative affairs office.

22 Q. She began -- excuse me.

23 A. So that's how I know her.

24 Q. Excuse me for interrupting you, sir. Did
25 she begin to work as an intern in the White House in

1 the summer of 1995?

2 A. I don't know when she started working at
3 the White House.

4 Q. Do you recall when you met her for the
5 first time?

6 A. It would be sometime, I'd think, in later
7 1995.

8 Q. She began to work in the White House office
9 of legislative affairs around December of 1995,
10 correct?

11 A. I have no idea.

12 Q. Do you know how she obtained that job?

13 A. No.

14 Q. Did you ever talk to anyone about finding a
15 job for Monica Lewinsky?

16 A. When she got the job in the legislative
17 affairs office? No.

18 Q. Before she got that job.

19 A. No.

20 Q. Did you ever talk to anyone about the
21 possibility of her obtaining a job in the White
22 House?

23 A. She, she came there as an intern, and as
24 several of them have, she applied for some job there
25 apparently and got the job. I was not involved in

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

3 Q. And you never talked to anyone about that?

4 A. No, I did not.

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

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

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

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

15 Q. And worked at the Pentagon, correct?

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

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

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

1 all working there, and so I saw her on two or three
2 occasions then, and then when she worked at the White
3 House, I think there was one or two other times when
4 she brought some documents to me.

5 Q. Well, you also saw her at a number of
6 social functions at the White House, didn't you?

7 A. Could you be specific? I'm not sure. I
8 mean when we had, when we had like big staff things
9 for, if I had a, like in the summertime, if I had a
10 birthday party and the whole White House staff came,
11 then she must have been there. If we had a Christmas
12 party and the whole White House staff was invited,
13 she must have been there. I don't remember any
14 specific social occasions at the White House, but
15 people who work there when they're invited to these
16 things normally come. It's a -- they work long
17 hours, it's hard work, and it's one of the nice
18 things about being able to work there, so I assume
19 she was there, but I don't have any specific
20 recollection of any social events.

21 JUDGE WRIGHT: I want to interrupt because
22 I want a break. I also wanted to ask about the
23 luncheon break. We're not, we're not too far from
24 twelve. I personally don't care when we take it, but
25 has Skadden lawyers arranged for lunch to be brought

1 me things on the weekends. She -- it seems to me she
2 brought things to me once or twice on the weekends.
3 In that case, whatever time she would be in there,
4 drop it off, exchange a few words and go, she was
5 there. I don't have any specific recollections of
6 what the issues were, what was going on, but when the
7 Congress is there, we're working all the time, and
8 typically I would do some work on one of the days of
9 the weekends in the afternoon.

10 Q. So I understand, your testimony is that it
11 was possible, then, that you were alone with her, but
12 you have no specific recollection of that ever
13 happening?

14 A. Yes, that's correct. It's possible that
15 she, in, while she was working there, brought
16 something to me and that at the time she brought it
17 to me, she was the only person there. That's
18 possible.

19 Q. Did it ever happen that you and she went
20 down the hallway from the Oval Office to the private
21 kitchen?

22 MR. BENNETT: Your Honor, excuse me, Mr.
23 President, I need some guidance from the Court at
24 this point. I'm going to object to the innuendo.
25 I'm afraid, as I say, that this will leak. I don't

1 question the predicates here. I question the good
2 faith of Counsel, the innuendo in the question.
3 Counsel is fully aware that Ms. Lewinsky has filed,
4 has an affidavit which they are in possession of
5 saying that there is absolutely no sex of any kind in
6 any manner, shape or form, with President Clinton,
7 and yet listening to the innuendo in the questions --

8 JUDGE WRIGHT: No, just a minute, let me
9 make my ruling. I do not know whether counsel is
10 basing this question on any affidavit, but I will
11 direct Mr. Bennett not to comment on other evidence
12 that might be pertinent and could be arguably
13 coaching the witness at this juncture. Now, I, Mr.
14 Fisher is an officer of this Court, and I have to
15 assume that he has a good faith basis for asking this
16 question. If in fact he has no good faith basis for
17 asking the question, he could later be sanctioned.
18 If you would like, I will be happy to review in
19 camera any good faith basis he might have.

20 MR. BENNETT: Well, Your Honor, with all
21 due respect, I would like to know the proffer. I'm
22 not coaching the witness. In preparation of the
23 witness for this deposition, the witness is fully
24 aware of Ms. Lewinsky's affidavit, so I have not told
25 him a single thing he doesn't know, but I think when

1 he asks questions like this where he's sitting on an
2 affidavit from the witness, he should at least have a
3 good faith proffer.

4 JUDGE WRIGHT: Now, I agree with you that
5 he needs to have a good faith basis for asking the
6 question.

7 MR. BENNETT: May we ask what it is, Your
8 Honor?

9 JUDGE WRIGHT: And I'm assuming that he
10 does, and I will be willing to review this in camera
11 if he does not want to reveal it to Counsel.

12 MR. BENNETT: Fine.

13 MR. FISHER: I would welcome an opportunity
14 to explain to the Court what our good faith basis is
15 in an in camera hearing.

16 JUDGE WRIGHT: All right.

17 MR. FISHER: I would prefer that we not
18 take the time to do that now, but I can tell the
19 Court I am very confident there is substantial
20 basis.

21 JUDGE WRIGHT: All right, I'm going to
22 permit the question. He's an officer of the Court,
23 and as you know, Mr. Bennett, this Court has ruled on
24 prior occasions that a good faith basis can exist
25 notwithstanding the testimony of the witness, of the

1 deponent, and the other party.

2 MR. BENNETT: Yes, Your Honor, but you
3 understand, and I'm not arguing with you what my
4 concern is, Your Honor, I wouldn't have any trouble
5 with that if I knew that this deposition would be
6 kept under seal. But when he mentions names, when he
7 knows, or at least, you know, hearsay, hearsay,
8 hearsay about something, they check it out, they get
9 an affidavit from the woman, they ask these
10 questions, and the Washington Times will have her
11 name on the front page tomorrow or the day after.

12 JUDGE WRIGHT: As you know, I'm extremely
13 sympathetic with your position, however this is a
14 discovery deposition.

15 MR. BENNETT: I understand. That's all
16 right, Your Honor, I'm sorry.

17 JUDGE WRIGHT: Go ahead.

18 MR. FISHER: Thank you, Your Honor.

19 THE WITNESS: What was your question again,
20 sir?

21 MR. FISHER: I've forgotten, Mr. President,
22 I'm sorry.

23 JUDGE WRIGHT: Something about Ms. Lewinsky
24 in the hallway.

25 Q. Do you recall ever walking with Monica

1 Lewinsky down the hallway from the Oval Office to
2 your private kitchen there in the White House?

3 A. Well, let me try to describe the facts
4 first, because you keep talking about this private
5 kitchen. The private kitchen is staffed by two naval
6 aides. They have total, unrestricted access to my
7 dining room, to that hallway, to coming into the Oval
8 Office. The people who are in the outer office of
9 the Oval Office can also enter at any time.

10 I was, after I went through a presidential
11 campaign in which the far right tried to convince the
12 American people I had committed murder, run drugs,
13 slept in my mother's bed with four prostitutes, and
14 done numerous other things, I had a high level of
15 paranoia.

16 There are no curtains on the Oval Office,
17 there are no curtains on my private office, there are
18 no curtains or blinds that can close the windows in
19 my private dining room. The naval aides come and go
20 at will. There is a peephole on the office that
21 George Stephanopoulos first and then Rahm Emanuel
22 occupied that looks back down that corridor.

23 I have done everything I could to avoid the
24 kind of questions you are asking me here today, so to
25 talk about this kitchen as if it is a private

1 kitchen, it's a little cubbyhole, and these guys keep
2 the door open. They come and go at will. Now that's
3 the factual background here.

4 Now, to go back to your question, my
5 recollection is that, that at some point during the
6 government shutdown, when Ms. Lewinsky was still an
7 intern but was working the chief staff's office
8 because all the employees had to go home, that she
9 was back there with a pizza that she brought to me
10 and to others. I do not believe she was there alone,
11 however. I don't think she was. And my recollection
12 is that on a couple of occasions after that she was
13 there but my secretary, Betty Currie, was there with
14 her. She and Betty are friends. That's my, that's
15 my recollection. And I have no other recollection of
16 that.

17 MR. FISHER: While I appreciate all of that
18 information, for the record I'm going to object.
19 It's nonresponsive as to the entire answer up to the
20 point where the deponent, said, "Now back to your
21 question."

22 Q. At any time were you and Monica Lewinsky
23 alone in the hallway between the Oval Office and this
24 kitchen area?

25 A. I don't believe so, unless we were walking

1 back to the back dining room with the pizza. I just,
2 I don't remember. I don't believe we were alone in
3 the hallway, no.

4 Q. Are there doors at both ends of the
5 hallway?

6 A. They are, and they're always open.

7 Q. At any time have you and Monica Lewinsky
8 ever been alone together in any room in the White
9 House?

10 A. I think I testified to that earlier. I
11 think that there is a, it is -- I have no specific
12 recollection, but it seems to me that she was on duty
13 on a couple of occasions working for the legislative
14 affairs office and brought me some things to sign,
15 something on the weekend. That's -- I have a general
16 memory of that.

17 Q. Do you remember anything that was said in
18 any of those meetings?

19 A. No. You know, we just have conversation, I
20 don't remember.

21 Q. How long has Betty Currie been your
22 secretary?

23 A. Since I've been President.

24 Q. Did she also work with you in Arkansas?

25 A. Not when I was Governor. She worked in the

1 transition. She worked for Warren Christopher in the
2 transition, and then she came to work for me.

3 Q. How is her work schedule arranged? Does
4 she have a certain shift that she works, or do you
5 ask her to work certain hours the following day?
6 Please explain how her schedule is determined.

7 A. She works, she comes to work early in the
8 morning and normally stays there until I leave at
9 night. She works very long hours, and then when I
10 come in on the weekend, or on Saturday, if I work on
11 Saturday, she's there, and normally if I'm, if I'm
12 working on Sunday and I'm having a schedule of
13 meetings, either she or Nancy Hernreich will be
14 there. One of them is always there on the weekend.
15 Sometimes if I come over just with paperwork and work
16 for a couple of hours, she's not there, but otherwise
17 she's always there when I'm there.

18 Q. Are there any other individuals who are
19 specifically assigned to be your secretary?

20 A. No, just Betty. Betty and Nancy Hernreich
21 basically runs the outer office for me. They are my
22 two major assistants, and of course, and there are a
23 couple of other people who work with them, Janice
24 Kearney who keeps my, in effect, diary now of what's
25 going on, who's been -- she's been doing that maybe a

1 year or so, and a couple of other young women who
2 work with Nancy. But physically, outside my office,
3 there's Nancy and Betty.

4 Q. Now, Betty Currie and Monica Lewinsky are
5 friends, correct?

6 A. That's correct, they are friends.

7 Q. And how do you know they're friends?

8 A. Well, I know they're friends because,
9 because Betty befriended her when she was working
10 there, and I think Betty met her, my recollection is,
11 through, I think she was recommended for the
12 internship by a man named Walter Kaye who's a good
13 friend of mine and a good friend of our
14 administration, good friend of my family's, and Betty
15 and Walter were friends, and I think that's how it
16 happened. I think Betty just sort of adopted her,
17 you know. She's much younger than Betty, obviously.
18 I think Betty just took an interest in her and kind
19 of adopted her and has kept in touch with her over
20 the time since she left the White House.

21 Q. Monica would be about twenty-four years
22 old?

23 A. I'm not sure exactly how old she is, but
24 she's a young woman.

25 Q. Now, to your knowledge, has Monica Lewinsky

1 ever sent any letters from the Pentagon to Betty
2 Currie in the White House?

3 A. I don't know. You'd have to ask Betty
4 about that. It wouldn't surprise me but you'd have
5 to ask her.

6 Q. Did Betty Currie ever bring to you a
7 personal message from Monica Lewinsky that had been
8 delivered to Betty?

9 A. On a couple of occasions, Christmas card,
10 birthday card, like that.

11 Q. Do you remember anything that was written
12 in any of those?

13 A. No. Sometimes, you know, just either small
14 talk or happy birthday or sometimes, you know, a
15 suggestion about how to get more young people
16 involved in some project I was working on. Nothing
17 remarkable. I don't remember anything particular
18 about it.

19 Q. Are those kept somewhere?

20 A. I don't think so.

21 Q. What did you do with them after you were
22 done with them?

23 A. I think I discarded them. I normally do.
24 People send me personal notes and stuff like that. I
25 just throw them away.

1 Q. Why were they sent addressed to Betty
2 Currie instead of to you?

3 A. I have no idea if they were. I don't
4 know. I don't have any idea how, you know, I get a
5 lot of people send Betty things and Nancy things,
6 send other people things because they think there is
7 a higher chance that I'll get to see them. There are
8 any number of people who get letters that they are
9 then asked to deliver to me in the White House
10 because we get -- the volume of mail is so crushing,
11 they're afraid if, you know, they just send it I
12 won't see it, and in fact that sometimes happens. I
13 regret to say I've had a lot of friends, even on
14 occasions family members, say they sent me something
15 and I never saw it.

16 Q. Did you ever receive from Monica Lewinsky a
17 tape with a recorded message to you?

18 A. I don't believe so.

19 Q. Did you ever receive from Monica Lewinsky a
20 videotape?

21 A. No. What of? I'm almost positive I
22 didn't.

23 Q. Did you ever receive from Monica
24 Lewinsky -- excuse me, strike that.

25 Did you ever receive from Betty Currie

1 either an audiotape or a videotape that you
2 understood had come from Monica Lewinsky?

3 A. I don't think so. I don't remember if I
4 did. You know, let me just, again, this is not
5 responsive, but it might help you in the questions
6 asked. On a periodic basis, Betty Currie will have
7 just books, neckties, things that people send that
8 get, that aggregate, accumulate. She said you want
9 these or shall I send them to the archives and stuff
10 like that, and I'll go over them, and she handles all
11 that, or someone does, and gives it to her, and so
12 normally when people send me things I don't see
13 them. You know, if there's some friend I meet along
14 the way in Chicago or someplace who hands me a tie or
15 hands me a book or something like that, maybe I would
16 see it. Otherwise I normally wouldn't see it unless
17 Betty or someone else, you know, just has it there.

18 Q. Well, if you don't see it, who makes the
19 decision whether to discard it versus sending it to
20 archives?

21 A. I have no idea. I don't know how it's
22 handled.

23 Q. Has it ever happened to your knowledge that
24 Monica Lewinsky met with Betty Currie in the White
25 House between the hours of midnight and six a.m.?

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1 A. I don't know.

2 Q. Have you ever met with Monica Lewinsky in
3 the White House between the hours of midnight and six
4 a.m.?

5 A. I certainly don't think so.

6 Q. Have you ever met --

7 A. Now, let me just say, when she was working
8 there, during, there may have been a time when we
9 were all -- we were up working late. There are lots
10 of, on any given night, when the Congress is in
11 session, there are always several people around until
12 late in the night, but I don't have any memory of
13 that. I just can't say that there could have been a
14 time when that occurred, I just -- but I don't
15 remember it.

16 Q. Certainly if it happened, nothing
17 remarkable would have occurred?

18 A. No, nothing remarkable. I don't remember
19 it.

20 Q. It would be extraordinary, wouldn't it, for
21 Betty Currie to be in the White House between
22 midnight and six a.m., wouldn't it?

23 A. I don't know what the facts were. I mean I
24 don't know. She's an extraordinary woman.

25 Q. Does that happen all the time, sir, or

1 rarely?

2 A. Well, I don't know, because normally I'm
3 not there between midnight and six, so I wouldn't
4 know how many times she's there. Those are questions
5 you'd have to ask her. I just can't say.

6 Q. Has it ever happened that a White House
7 record was created that showed that Monica Lewinsky
8 was meeting with Betty Currie when in fact Monica
9 Lewinsky was meeting with you?

10 MR. BENNETT: Yes, Your Honor. I'm going to
11 certainly let the President answer that, but I object
12 to the form of the question because it assumes facts
13 not in evidence, and I again question their good
14 faith in this line of questioning.

15 JUDGE WRIGHT: I overrule the objection. I
16 will permit it. The nature of many of the responses
17 has been he doesn't recall or he doesn't know, and so
18 he has not outright denied it. This is discovery and
19 I'll permit the question. Go ahead.

20 A. Would you repeat the question?

21 Q. Yes, sir. Has it ever happened that a
22 White House record was created that reflected that
23 Betty Currie was meeting with Monica Lewinsky when in
24 fact you were meeting with Monica Lewinsky?

25 A. Not to my knowledge.

1 Q. Are there records created of your meetings
2 with people in the White House?

3 A. I believe we have a record of the people
4 that, that see me. We have -- I think there's a
5 record of everybody that comes in and out of the
6 White House. Of course the people who work there and
7 have permission to be there can come in and out and
8 move in and out of the offices, and I don't know if
9 there are records of all those meetings or not. For
10 example there are several of my staff people I see
11 many times a day, and I have no idea whether there
12 is a record of every time I see those people.

13 Q. All right, sir, and I appreciate that, but
14 just to be precise, I'm not just asking about records
15 of everyone coming into the White House, but I'm
16 asking specifically about records of meetings with
17 you.

18 A. The answer to that is I don't know. I mean
19 I, Rahm Emanuel comes through that back door into the
20 kitchen and the hallway you talked about three or
21 four times a day, unannounced, unscheduled, sometimes
22 at night, sometimes in the daytime. I have no idea
23 if there's a record of every time he comes to see
24 me. I have no idea if there's a record of every time
25 John Podesta comes down the hall and sticks his head

1 in and talks to me about something. I simply don't
2 know. I don't know the answer to your question.

3 Q. You suspect, don't you, that there are at
4 least some meetings that you have for which there's
5 no written record made, correct?

6 A. I don't know the answer to that. They keep
7 a pretty good record of everything I do, I think.

8 Q. When was the last time you spoke with
9 Monica Lewinsky?

10 A. I'm trying to remember. Probably sometime
11 before Christmas. She came by to see Betty sometime
12 before Christmas. And she was there talking to her.
13 and I stuck my head out, said hello to her.

14 Q. Stuck your head out of the Oval Office?

15 A. Uh-huh, Betty said she was coming by and
16 talked to her, and I said hello to her.

17 Q. Was that shortly before Christmas or --

18 A. I'm sorry, I don't remember. Been sometime
19 in December, I think, and I believe -- that may not
20 be the last time. I think she came to one of the,
21 one of the Christmas parties.

22 Q. Did she tell you she had been served with a
23 subpoena in this case?

24 A. No. I don't know if she had been.

25 Q. Did anyone other than your attorneys ever

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1 tell you that Monica Lewinsky had been served with a
2 subpoena in this case?

3 A. I don't think so.

4 Q. Did you ever talk with Monica Lewinsky
5 about the possibility that she might be asked to
6 testify in this case?

7 A. Bruce Lindsey, I think Bruce Lindsey told
8 me that she was. I think maybe that's the first
9 person told me she was. I want to be as accurate as
10 I can.

11 MR. BENNETT: Keep your voice up Mr.
12 President.

13 THE WITNESS: Okay.

14 A. But he may not have. I don't have a
15 specific memory, but I talked with him about the case
16 on more than one occasion, so he might have said
17 that.

18 Q. Did he tell you that on the phone or in
19 person?

20 A. I don't know. I talk to him and see him
21 several times a day, so I don't know. I would have
22 no way of remembering that.

23 Q. Did you talk to Mr. Lindsey about what
24 action, if any, should be taken as a result of her
25 being served with a subpoena?

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1 A. No.

2 Q. I believe I was starting to ask you a
3 question a moment ago and we got sidetracked. Have
4 you ever talked to Monica Lewinsky about the
5 possibility that she might be asked to testify in
6 this lawsuit?

7 A. I'm not sure, and let me tell you why I'm
8 not sure. It seems to me the, the, the -- I want to
9 be as accurate as I can here. Seems to me the last
10 time she was there to see Betty before Christmas we
11 were joking about how you-all, with the help of the
12 Rutherford Institute, were going to call every woman
13 I'd ever talked to, and I said, you know --

14 MR. BENNETT: We can't hear you, Mr.
15 President.

16 A. And I said that you-all might call every
17 woman I ever talked to and ask them that, and so I
18 said you would qualify, or something like that. I
19 don't, I don't think we ever had more of a
20 conversation than that about it, but I might have
21 mentioned something to her about it, because when I
22 saw how long the witness list was, or I heard about
23 it, before I saw, but actually by the time I saw it
24 her name was on it, but I think that was after all
25 this had happened. I might have said something like

1 that, so I don't want to say for sure I didn't,
2 because I might have said something like that.

3 Q. Was anyone else present when you said
4 something like that?

5 A. Betty, Betty was present, for sure.
6 Somebody else might have been there, too, but I said
7 that to a lot of people. I mean that was just
8 something I said.

9 Q. What, if anything, did Monica Lewinsky say
10 in response?

11 A. Nothing that I remember. Whatever she
12 said, I don't remember. Probably just some
13 predictable thing.

14 Q. Recently you took a trip that included a
15 visit to Bosnia, correct?

16 A. That's correct.

17 Q. While you were on that trip, did you talk
18 to Monica Lewinsky?

19 A. I don't believe she was on that trip.

20 Q. Did you talk to her on the telephone?

21 A. No.

22 Q. While you were on that trip, did you ask
23 anyone to talk to her?

24 A. I don't believe so, no. Can you be more
25 specific? I don't have any idea. I don't think so,

1 no.

2 Q. While you were on that trip, did you ask
3 anyone to meet with her?

4 A. Not to my knowledge.

5 Q. Excluding conversations that you may have
6 had with Mr. Bennett or any of your attorneys in this
7 case, within the past two weeks has anyone reported
8 to you that they had had a conversation with Monica
9 Lewinsky concerning this lawsuit?

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

12 Q. You know a man named Vernon Jordan?

13 A. I know him well.

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

15 A. A long time.

16 Q. Has it ever been reported to you that he
17 met with Monica Lewinsky and talked about this case?

18 A. I knew that he met with her. I think Betty
19 suggested that he meet with her. Anyway, he met with
20 her. I, I thought that he talked to her about
21 something else. I didn't know that -- I thought he
22 had given her some advice about her move to New
23 York. Seems like that's what Betty said.

24 Q. So Betty, Betty Currie suggested that
25 Vernon Jordan meet with Monica Lewinsky?

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1 A. I don't know that.

2 Q. I thought you just said that. I'm sorry.

3 A. No, I think, I think, I think Betty told me
4 that Vernon talked to her, but I, my impression was
5 that Vernon was talking to her about her moving to
6 New York. I think that's what Betty said to me.

7 Q. What do you know about her moving to New
8 York?

9 A. Just that.

10 Q. Is she going to move to New York?

11 A. I don't know. She may have already moved
12 to New York. I don't know. My understanding was
13 that her mother moved to New York and that she was
14 going to move to New York and that she was looking
15 for some advice about what she should do when she got
16 there.

17 Q. Is it your understanding that she was
18 offered a job at the U.N.?

19 A. I know that she interviewed for one. I
20 don't know if she was offered one or not.

21 Q. Have you ever talked to Bill Richardson
22 about Monica Lewinsky?

23 A. No.

24 Q. What is his title?

25 A. He's the Ambassador to the U.N.

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1 JUDGE WRIGHT: I'm sorry, I didn't hear
2 that.

3 THE WITNESS: He's the Ambassador to the
4 U.N.

5 Q. Have you ever asked anyone to talk to Bill
6 Richardson about Monica Lewinsky?

7 A. I believe that, I believe that Monica, what
8 I know about that is I believe Monica asked Betty
9 Currie to ask someone to talk to him, and she and
10 she talked to him and went to an interview with him.
11 That's what I believe happened.

12 Q. And the source of that information is who?

13 A. Betty. I think that's what Betty -- I
14 think Betty did that. I think Monica talked to Betty
15 about moving to New York, and I, my recollection is
16 that that was the chain of events.

17 Q. Did you say or do anything whatsoever to
18 create a possibility of Monica Lewinsky getting a job
19 at the U.N.?

20 A. To my knowledge, no, although I must say I
21 wouldn't have thought there was anything wrong with
22 it. You know, she was a -- she had worked in the
23 White House, she had worked in the Defense
24 Department, and she was moving to New York. She was
25 a friend of Betty. I certainly wouldn't have been

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1 opposed to it, based on anything I knew, anyway.

2 Q. Well, have you ever given any gifts to
3 Monica Lewinsky?

4 A. I don't recall. Do you know what they
5 were?

6 Q. A hat pin?

7 A. I don't, I don't remember. But I
8 certainly, I could have.

9 Q. A book about Walt Whitman?

10 A. I give -- let me just say I give people a
11 lot of gifts, and when people are around I give a lot
12 of things I have at the White House away, so I could
13 have given her a gift, but I don't remember a
14 specific gift.

15 Q. Do you remember giving her a gold broach?

16 A. No.

17 Q. Do you remember giving her an item that had
18 been purchased from The Black Dog store at Martha's
19 Vineyard?

20 A. I do remember that, because when I went on
21 vacation, Betty said that, asked me if I was going to
22 bring some stuff back from The Black Dog, and she
23 said Monica loved, liked that stuff and would like to
24 have a a piece of it, and I did a lot of Christmas
25 shopping from The Black Dog, and I bought a lot of

1 things for a lot of people, and I gave Betty a couple
2 of the pieces, and she gave I think something to
3 Monica and something to some of the other girls who
4 worked in the office. I remember that because Betty
5 mentioned it to me.

6 Q. What in particular was given to Monica?

7 A. I don't remember. I got a whole bag full
8 of things that I bought at The Black Dog. I went
9 there they gave me some things and I went and
10 purchased a lot at their store and when I came back
11 I gave a, a big block of it to Betty, and I don't
12 know what she did with it all or who got what.

13 Q. But while you were in the store you did
14 pick out something for Monica, correct?

15 A. While I was in the store -- first of all,
16 The Black Dog sent me a selection of things. Then I
17 went to the store and I bought some other things,
18 t-shirts, sweatshirts, shirts. Then when I got back
19 home, I took out a thing or two that I wanted to
20 keep, and I took out a thing or two I wanted to give
21 to some other people, and I gave the rest of it to
22 Betty and she distributed it. That's what I remember
23 doing.

24 Q. Has Monica Lewinsky ever given you any
25 gifts?

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1 A. Once or twice. I think she's given me a
2 book or two.

3 Q. Did she give you a silver cigar box?

4 A. No.

5 Q. Did she give you a tie?

6 A. Yes, she has given me a tie before. I
7 believe that's right. Now, as I said, let me remind
8 you, normally when I get these ties, I get ties, you
9 know together, and then they're given to me later
10 but I believe that she has given me a tie.

11 Q. Well, Mr. President, it's my understanding
12 that Monica Lewinsky has made statements to people,
13 and I'd like for you --

14 MR. BRISTOW: Object, object to the form of
15 the question. Counsel shouldn't testify, and when
16 you start out like that, it's obviously counsel
17 testifying. I don't think that's proper.

18 MR. BENNETT: Let me add to that, Your
19 Honor wouldn't permit me to make reference to this
20 affidavit, and I respect your ruling.

21 JUDGE WRIGHT: Let me, let me just make my
22 ruling. It is not appropriate for Counsel to make
23 comments about, about these things. I don't know
24 whether he was trying to do this to establish a good
25 faith basis for the next question or not, but it is

1 inappropriate for counsel to comment, so I will
2 sustain the objection.

3 MR. FISHER: I understand.

4 Q. Did you have an extramarital sexual affair
5 with Monica Lewinsky?

6 A. No.

7 Q. If she told someone that she had a sexual
8 affair with you beginning in November of 1995, would
9 that be a lie?

10 A. It's certainly not the truth. It would not
11 be the truth.

12 Q. I think I used the term "sexual affair."
13 And so the record is completely clear, have you ever
14 had sexual relations with Monica Lewinsky, as that
15 term is defined in Deposition Exhibit 1, as modified
16 by the Court?

17 MR. BENNETT: I object because I don't know
18 that he can remember --

19 JUDGE WRIGHT: Well, it's real short. He
20 can -- I will permit the question and you may show
21 the witness definition number one.

22 A. I have never had sexual relations with
23 Monica Lewinsky. I've never had an affair with her.

24 Q. Have you ever had a conversation with
25 Vernon Jordan in which Monica Lewinsky was

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1 mentioned?

2 A. I have. He told me that he called -- he
3 mentioned in passing to me that he had talked to her,
4 and she had come to him for advice about moving to
5 New York.

6 Q. She had come to him for advice?

7 A. Uh-huh. She'd come to him for advice about
8 moving to New York. She had called him and asked if
9 she could come see him and Betty^W I think had maybe
10 said something to him about talking to her and he
11 had given her some advice about moving to New York.
12 That's all I know about that.

13 Q. Where were you when you had this
14 conversation with Vernon Jordan.

15 A. I don't have any idea. I talk to Vernon
16 Jordan a lot.

17 Q. Do you recall whether it was on the phone
18 or in person?

19 A. No.

20 Q. What did he say that she had said to him in
21 response?

22 A. He just said she seemed like a bright,
23 energetic young woman and she had certain interests,
24 and he made some suggestions to her and suggested
25 where she ought to go for interviews. That's all I

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1 know about that.

2 Q. Did you express any approval or disapproval
3 of anything Mr. Jordan had done?

4 MR. BENNETT: I object. I don't know what
5 that means, Your Honor. That's awfully vague and
6 ambiguous. Could you be more specific?

7 MR. FISHER: Sure.

8 Q. At the time you talked to Vernon Jordan
9 about his conversation with Monica Lewinsky
10 concerning her possible move to New York did you
11 express any approval or disapproval?

12 A. I don't remember. I think he was just
13 reporting on the meeting to me. There'd be no reason
14 that I would have disapproved. I can't think of any
15 reason I would have disapproved it. She was a young
16 woman who'd worked in the White House and had gone to
17 work in the Defense Department and was moving to New
18 York. I would not have thought there was anything
19 wrong with that, with us trying to help her.

20 Q. Is it your testimony that you had nothing
21 whatsoever to do with causing that conversation to
22 take place between Monica Lewinsky and Vernon
23 Jordan?

24 MR. BENNETT: I object. That, that
25 misstates the testimony.

1 MR. FISHER: I'm asking what his testimony
2 is.

3 MR. BENNETT: Anything to do, I think he's
4 testified, Your Honor. If he wants to ask more
5 questions, that's all right, but --

6 JUDGE WRIGHT: I will -- you might rephrase
7 the question and ask whether he ever intended to
8 facilitate the conversation or took any action to
9 help Ms. Lewinsky gain access to Vernon Jordan for
10 this purpose or for any purpose. You might ask
11 that. The President has testified on this matter
12 that he doesn't think it would be improper if he had,
13 so go ahead, you can ask.

14 Q. Did you do anything, sir, to prompt this
15 conversation to take place between Vernon Jordan and
16 Monica Lewinsky?

17 A. I can tell you what my memory is. My
18 memory is that Vernon said something to me about her
19 coming in, Betty had called and asked if he would see
20 her and he said she would, he said he would, and then
21 she called him and then he said something to me about
22 it. I'm sure if he said something to me about it I
23 said something positive about it. I wouldn't have
24 said anything negative about it. I didn't have any
25 negative knowledge. I mean there would be no reason

1 for me to be negative about it. Vernon liked to help
2 people. He was always trying to help people.

3 Q. My question, though, is focused on the time
4 before the conversation occurred, and the question is
5 whether you did anything to cause the conversation to
6 occur.

7 A. I think in the mean -- I'm not sure how you
8 mean the question. I think the way you mean the
9 question, the answer to that is no. I've already
10 testified. What my memory of this is, if you're
11 asking did I set the meeting up, I do not believe
12 that I did. I believe that Betty did that, and she
13 may have mentioned. asked me if I thought it was all
14 right if she did it, and if she did ask me I would
15 have said yes, and so if that happened, then I did
16 something to cause the conversation to occur. If
17 that's what you mean, yes. I didn't think there was
18 anything wrong with it. It seemed like a natural
19 thing to do to me. But I don't believe that I
20 actually was the precipitating force. I think that
21 she and Betty were close, and I think Betty did it.
22 That's my memory of it.

23 Q. Have you ever had a conversation with
24 Vernon Jordan in which Paula Jones was mentioned?

25 A. I'm sure I have. I don't remember what it

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1 would have been, but I'm sure I have. I mean after
2 all this time, I'm sure I have.

3 MR. BRISTOW: Your Honor, I just think we
4 should note for the record that it is now almost
5 twelve-thirty, and to my knowledge this is the first
6 moment in the deposition that the word "Paula Jones"
7 has been mentioned.

8 JUDGE WRIGHT: Are you suggesting we take a
9 break?

10 MR. BRISTOW: I think it's a good time for
11 a break, but I'm also thinking of the fact that we do
12 have some time constraints and -- but anyway, I just
13 thought it was an appropriate thing to note.

14 MR. BENNETT: Your Honor, I hope the
15 sandwiches are there, but I'm happy to break now, but
16 I'd like to get some guidance from the Court on
17 something. If at the completion of, as he has
18 apparently just completed Miss Lewinsky.

19 MR. FISHER: No, I haven't, but go ahead.

20 MR. BENNETT: Oh, I'm sorry, well, I'll
21 wait until you finish with Miss Lewinsky.

22 MR. FISHER: I have just a couple of other
23 things.

24 MR. BENNETT: I can ask my generic
25 question. Hypothetically, Your Honor, if I have

1 affidavits of women that he's questioning the
2 President about and Your Honor does not want me to
3 emphasize that or even mention it for fear of the
4 witness, when they are, when he is finished at the
5 end of the day, may I read to the President certain
6 relevant portions of those affidavits that we have
7 and they have and ask the President if that's, as far
8 as he knows, a true and accurate statement?

9 JUDGE WRIGHT: You may, because this is
10 that type of deposition.

11 MR. BENNETT: Thank you.

12 JUDGE WRIGHT: And I realize that you want
13 to make your record because you're fearful about what
14 might take place.

15 MR. BENNETT: Thank you, Your Honor, thank
16 you, Your Honor.

17 JUDGE WRIGHT: Would you like to finish
18 these questions now before we break?

19 MR. FISHER: I have just a couple more on
20 this particular subject.

21 JUDGE WRIGHT: All right, all right, let's
22 proceed then.

23 Q. Mr. President, have you ever paid any money
24 to Monica Lewinsky?

25 A. No, sir.

1 Q. Have you ever caused money to be paid to
2 her?

3 A. Absolutely not.

4 Q. Have you ever paid off any debt that she
5 owed to some other person?

6 A. No, sir.

7 Q. Have you ever caused a debt that she owed
8 to some other person to be repaid?

9 A. No, sir.

10 MR. FISHER: That's all I have on that
11 subject.

12 JUDGE WRIGHT: All right, how much time --
13 I'm suggesting we have lunch for, within the next
14 half hour and then come back here in half an hour.

15 MR. BENNETT: Would you like to break
16 now --

17 THE WITNESS: Mr. Fisher, is there
18 something, let me just -- you asked that with such
19 conviction and I answered with such conviction, is
20 there something you want to ask me about this? I
21 don't, I don't even know what you're talking about, I
22 don't think.

23 MR. FISHER: Sir, I think this will come to
24 light shortly, and you'll understand.

25 MR. BENNETT: Your Honor, we've had an

1 awful lot of innuendo, and I object to it, and if
2 they have it, let's get to it.

3 JUDGE WRIGHT: Well, I'm not -- we're going
4 to have a break for lunch for half an hour. I will
5 use this time for Counsel for Ms. Jones to provide me
6 with anything in camera that they might like to with
7 respect to a good faith basis for some of the
8 questions to which Counsel have objected. Again,
9 this is discovery. We're not applying the Rules of
10 Evidence. There must be a good faith basis for the
11 questions and I have not seen any of the deposition
12 I mean, excuse me, any of the affidavits to which
13 you're referring. I had not even heard of some of
14 these individuals until Monday when we met to discuss
15 the -- and I hate this word -- the parameters of the
16 deposition, and so if you would please provide me
17 with an in camera documents or document or documents,
18 or you can just tell me in camera off the record what
19 your good faith basis is, then I can rule.

20 MR. CAMPBELL: Will we do that in your room
21 Judge, here?

22 JUDGE WRIGHT: You can do that in my room,
23 yeah, doesn't matter.

24 MR. BENNETT: Your Honor, that's fine with
25 me. I have no objection to that, but since Your

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1 Honor has ruled that I will be permitted to do that,
2 I don't feel that's necessary, and withdraw my
3 request that they do that. What I was worried about
4 is that a record would be finished and we'd just have
5 a lot of innuendo, so I think as long as I'm
6 permitted to do that, then I think it would be --

7 JUDGE WRIGHT: You may. And keep in mind,
8 also, I don't know just for what purposes this
9 deposition will be used. It's certainly a discovery
10 deposition, that's the initial purpose. It's clear
11 that because the Defendant is the President, and
12 because this Court has actually enormous discretion
13 with respect to the conduct of this case with respect
14 to the Defendant, it could be possible that this
15 might even be used for evidentiary purposes if Mr.
16 Clinton can't be present to testify, and that is
17 another reason I will permit Mr. Bennett to
18 rehabilitate the witness or put anything else on the
19 record that you might think would be appropriate.

20 MR. BENNETT: That being the case, Your
21 Honor, I would ask that they not meet with you
22 privately. I would never have the ability to
23 question or challenge that. I thought that was a
24 possible solution to a problem where I knew nothing
25 and you might have the opportunity to rule something

1 out, but since you've given me that leeway, it would
2 then be my view that since you are the trial judge
3 that there not be ex parte discussions on evidence,
4 and it was my suggestion, and I, and I admit to that,
5 but given what you just said, I think this is a
6 better way to handle it.

7 JUDGE WRIGHT: I'd like to give Counsel the
8 benefit of the doubt, and even though I do have very
9 grave concerns about the leak of information under
10 seal in this matter. I can't tie it directly to any
11 Counsel of Ms. Jones, and I have to, I don't believe
12 any of the Counsel here are responsible for these
13 leaks, and if I had reason to believe so, I would
14 take appropriate action.

15 MR. BENNETT: I would suggest that on
16 Monday you might have more of a factual basis since,
17 since the Rader firm is apparently doing the circuit
18 here in Washington.

19 MR. CAMPBELL: Your Honor, we object to
20 that side-bar.

21 JUDGE WRIGHT: Again, we have to assume
22 that all Counsel are playing by the rules set by the
23 Court and until that time, until it's brought to my
24 attention, otherwise I'll just have to rest on that
25 assumption. Let's take a break.

1 MR. BENNETT: Your Honor, one o'clock is
2 all right?

3 JUDGE WRIGHT: That's twenty-five minutes
4 from now. Yes, sir, one o'clock.

5 (Recess for lunch.)

6 JUDGE WRIGHT: All right, you may resume,
7 Mr. Fisher.

8 MR. FISHER: Thank you, Your Honor. We are
9 back on the record.

10 JUDGE WRIGHT: Let me say something before
11 we, before we go. Immediately prior to the break I
12 indicated I'd permit Mr. Bennett to rehabilitate the
13 witness, and I'll certainly do that. I did not mean
14 to imply that I would violate any rules of evidence
15 in so doing. You understand that?

16 MR. BENNETT: I understand that.

17 JUDGE WRIGHT: All right, go ahead.

18 Q. Mr. President, in 1991 when you were
19 Governor of Arkansas, what records did you or your
20 staff keep of your daily schedule?

21 A. I don't know what records we kept. I can
22 tell you what records that I got. I got a schedule
23 every morning, and I could also get a block, you
24 know, for a month at a time generally outlining that,
25 so, and I'm sure that we must have kept all those

1 schedules.

2 Q. When you say we must have kept them --

3 A. I mean I'm sure that in the archives of the
4 files of the Governor's office there are -- I have
5 no, let me -- I'm not sure. I do not have any reason
6 to believe those schedules were thrown away.

7 Q. All right, sir. What about retrospective
8 records? Was there anything created after the fact?

9 MR. BENNETT: Excuse me, I object. I want
10 to be sure we're all talking on the same -- what do
11 you mean?

12 MR. FISHER: Well, I hadn't finished the
13 question.

14 MR. BENNETT: Well, retrospective, I'm not
15 sure. I'm sorry. I apologize.

16 Q. Was there ever a record created after the
17 fact mentioning the fact that you had done a certain
18 thing?

19 A. I don't know. I don't know exactly, I'm
20 not sure I understand the question, but I don't know
21 the answer.

22 Q. Well, it's a very broad question. With
23 regard to the daily schedules you mentioned, who
24 would prepare those in 1991?

25 A. I think Nancy Hernreich. She was my

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1 scheduler and she would have done that.

2 Q. Is that the same woman who currently works
3 with you in the White House?

4 A. That's correct.

5 Q. And I believe you said she manages the
6 office outside the Oval Office?

7 A. That's correct.

8 Q. Now, when you were Governor in 1991, did
9 you yourself keep a journal, diary, or any other sort
10 of written record of what you had done on a
11 particular day?

12 A. No, sir.

13 Q. Do you know of any record that might
14 refresh your recollection as to what happened on May
15 8th, 1991?

16 MR. BENNETT: Well, I withdraw the
17 objection.

18 A. Only the schedule, you know, I could look
19 at my schedule for that day. I don't think there
20 would be any other record that I'm aware of.

21 Q. I think I know what Mr. Bennett's concern
22 was so let me rephrase that question.

23 MR. BENNETT: Now we're moving, see, I
24 don't even have to -- good.

25 Q. Mr. President, do you know of any record

1 that might refresh your recollection as to what were
2 your activities on May 8th, 1991?

3 MR. BENNETT: That wasn't it.

4 A. No, sir. Only, as I said, only the,
5 whatever schedule was prepared for me that I, that I
6 used. As far as I know, that would be the only
7 record.

8 Q. If you wanted to find that schedule, how
9 would you go about looking for it?

10 A. I'd ask somebody who worked for me to
11 figure out how to get it out of the records.

12 Q. All right, sir. Who would you ask?

13 A. I don't -- it would depend on, it would
14 depend on what it was that I wanted to find, but I
15 think that my impression is that my office is
16 generally aware that there is a repository of records
17 of when I was Governor, and they would know how to go
18 get them. That's all I know.

19 Q. Okay. Without disclosing any confidential
20 communications with your attorneys, has such a
21 request ever been made with regard to May 8th, 1991?

22 A. I don't know. I assume so because I've
23 seen a copy of the schedule which purports to be the
24 schedule that I had on that day.

25 MR. BENNETT: Mr. President, I don't want

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1 you assuming anything, all right? He's entitled to
2 full and complete answer.

3 A. The answer, I don't know, but I must -- the
4 piece of paper must have come from somewhere.

5 Q. Okay. Have you looked at any document that
6 refreshed your memory with regard to what happened on
7 May 8th, 1991?

8 A. I've seen a copy of my schedule that day.

9 Q. Okay. How recently did you see that?

10 A. When I was -- I don't remember if I looked
11 at one when I was preparing for this testimony or
12 not, but I sort of think I did, but I've seen one in
13 the not-too-distant past.

14 MR. BENNETT: Let me tell you, may I
15 object? The problem that I have with this is I think
16 you have to ask him a question and then ask him if
17 something refreshes his recollection so we don't get
18 confused, Your Honor, between refreshed recollection
19 and past recollection recorded.

20 JUDGE WRIGHT: All right. Let me, let me
21 try to clarify where, where we're going here. If we
22 were in a courtroom, it would be permissible for you
23 to ask questions concerning that event, I mean or the
24 alleged events of the day, and then if you can't
25 remember, he could, as Mr. Bennett has indicated,

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1 under the Rules of Evidence he could take anything he
2 has written down to refresh his recollection. That
3 would be allowed. It is also permissible for you to
4 ask questions such as you're now asking, whether
5 there would be anything that might have been
6 contemporaneously written that could refresh his
7 recollection. Now, is that --

8 MR. BENNETT: Yeah, my only concern, Your
9 Honor, is I don't -- I wanted the record to be clear
10 of what is a refreshed recollection or what is just a
11 record, which he'd say, well, you know this is
12 probably what happened, I don't remember.

13 JUDGE WRIGHT: But it would be some kind of
14 contemporaneous record that would be ordinarily
15 kept. Is that what you're suggesting?

16 MR. BENNETT: Yeah, I can cut right through
17 it and save a lot of time. There is, there is an
18 agenda of what occurred on May 8th, 1991, which I
19 believe we have provided to them, I guess, the
20 schedule. I mean I --

21 MR. FISHER: Is there an objection
22 outstanding?

23 JUDGE WRIGHT: The objection was that he
24 thinks that there is, there could be confusion in the
25 record concerning whether the witness is saying well,

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1 I've reviewed these documents to prepare for the
2 deposition and therefore I think that this is what
3 happened, or whether he has a memory in his head
4 without those records, so you might, you might
5 clarify the basis upon which the witness is
6 testifying, his own recollection or his own
7 recollection as refreshed by documents he's
8 reviewed.

9 Q. I would be happy to do that, Your Honor.

10 JUDGE WRIGHT: All right.

11 (Exhibit 6 marked.)

12 Q. Let me hand you what has been marked
13 Deposition Exhibit 6, Mr. President. Is Deposition
14 Exhibit 6 a copy of the schedule to which you
15 testified a few moments ago?

16 A. No, sir, this is a copy of the, says it's a
17 copy of the agenda of the Governor's Quality
18 Conference. My schedule would have had only when I
19 was slated to go there on it, and it would have had
20 whatever else I was supposed to do that day.

21 Q. Do you recall ever seeing Deposition
22 Exhibit 6 or a copy of it before?

23 A. I have seen it in the last couple of days
24 preparing for this testimony. I don't recall ever
25 having seen it before that time. I don't recall

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1 having seen it contemporaneously. I could have, I
2 just don't remember.

3 Q. Do you have any recollection, apart from
4 what memory may have been refreshed through
5 documents, do you have any recollection of attending
6 the Third Annual Governor's Quality Conference at the
7 Excelsior Hotel in Little Rock, Arkansas, in May of
8 1991?

9 A. Just so I won't be misunderstood I'd like
10 to answer the question without a yes or no. What I
11 remember, what I know is that in the last few years I
12 was Governor, every year we had a quality conference,
13 quality management conference sponsored by the
14 state. There was also a second conference every year
15 sponsored by a private organization. I tried to
16 attend both of them, and as far as I know I did
17 attend both of them for the last two or three years I
18 was Governor. In that sense I remember going. I do
19 not remember that it was on May the 8th, and I don't
20 remember what I said that day in my speech or
21 anything like that, but I was very interested in
22 this. I set up a quality section in the AIDC and it
23 was important to me so I, you know, I tried to go to
24 all the meetings, and I remember going to two a year
25 for the past, for the two or three years before I

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1 began to run for President.

2 Q. So do I understand correctly, then, that
3 you don't have any recollection of anything in
4 particular that happened at the conference in May of
5 '91?

6 A. That's correct, I don't.

7 Q. You don't remember, for example, when you
8 arrived at the conference?

9 A. No. All I have there is my schedule. I
10 have no independent memory of it.

11 Q. And you don't have any independent memory
12 of when you left the conference, correct?

13 A. That's correct. I don't.

14 Q. Do you have any independent memory of which
15 state trooper was guarding you that day?

16 A. No, sir, I don't.

17 Q. And I mean guarding you at the conference;
18 did you understand that, sir?

19 A. (Witness nods head.)

20 MR. BENNETT: Mr. President, when you
21 answer, you have to speak. You shook your head yes,
22 but this lady has to --

23 A. I'm sorry. The -- we're not talking about
24 now what, what I may have learned since then. You're
25 talking about what I remember about what happened,

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1 what my independent recollection is of the events of
2 that day. I don't know.

3 Q. Right.

4 A. The, the troopers were on a rotating
5 schedule, so the trooper I had that day would, or the
6 trooper I had the next day or the trooper I had the
7 day before was just a matter of chance. I had
8 nothing to do with the allocation of their
9 responsibilities.

10 Q Now you've testified to what you do or
11 don't remember from independent recollection and now
12 let me ask you what you know from having your memory
13 refreshed through documents, if anything. By having
14 your memory refreshed through documents, do you
15 remember anything that happened at the Third Annual
16 Governor's Quality Conference at the Excelsior Hotel
17 in May of 1991?

18 MR. BENNETT: Now, are you -- excuse me.
19 I'm a little unclear. You mean newspaper articles?
20 This has been widely reported. Are you asking him
21 does he have an independent recollection today of
22 what happened, or what he thinks? I'm not clear what
23 you're asking.

24 MR. FISHER: I think the question was very
25 clear.

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1 A. The document, let me say, the documents
2 indicate that I went there and opened the conference
3 in the morning. That's -- my schedule does, but I
4 don't necessarily, I don't remember that it was on
5 May the 8th. I don't remember going. I don't
6 remember. I've been to literally hundreds, probably
7 thousands of events since then and had been by 1994
8 when I first heard about this, so I can't say that it
9 refreshed my recollection. I just know what the
10 documents reflect. The documents reflect that I
11 apparently went there in the morning and gave a talk
12 to open the conference.

13 Q. And my question now, sir, is not what any
14 document reflects because the documents speak for
15 themselves. My question was whether your memory was
16 refreshed by a document?

17 A. No. I will say again what I remember. I
18 have a general memory that I attended one of, two of
19 these a year, one, one sponsored by the state and one
20 sponsored by a private organization, for the last two
21 or three years I was Governor, before 1992 when I
22 started to run for President. That's all I remember
23 about any of them. They all, they've run together,
24 they blur together. I have no distinct disaggregated
25 memory of any of these conferences, and as far as I

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1 know they were all at the Excelsior Hotel, as most
2 meetings for the state were, most conventions were
3 that I attended.

4 Q. Do you have any independent memory of
5 anything that happened on May 8th, 1991, outside of
6 the conference?

7 A. No. Outside of the, outside of the
8 conference?

9 Q. Yes.

10 A. Well, my memory has been refreshed by
11 looking at the records. The records indicate that I
12 had a luncheon for a group from Luxembourg, and I
13 remember that quite clearly for a very good reason.
14 I worked very hard to -- I wouldn't have remembered
15 it was on May the 8th, but I remember when they came
16 to Arkansas, because the biggest company in
17 Luxembourg had a plant in southeast Arkansas, and I
18 had worked hard to get it there and I wanted to help
19 expand it, and it was a big important event for me as
20 Governor, and I think someone from the royal family
21 or something came to the lunch, I think. Anyway, it
22 was a distinguished group of people, and we had a big
23 long lunch for them, and it was a big, proper thing
24 and I remember that. That's about -- I didn't
25 remember it being on that day or what was before or

1 after or whatever, but I remember, I have a clear
2 memory of the event itself.

3 Q. Are there any other events that occurred on
4 May 8th, 1991, about which you have an independent
5 recollection?

6 A. No. My schedule says I had a barbecue that
7 evening. I don't even remember that. I don't, I
8 don't remember who it was for, what it was about or
9 anything.

10 (Exhibit 7 marked)

11 Q. I'm handing you now, sir, a document that
12 has been marked Deposition Exhibit 7 consisting of
13 three pages, the first page of which appears to be a
14 memorandum from Jan Partain to Nancy Hernandez dated
15 April 1st, 1991.

16 A. Uh-huh.

17 Q. Please take a moment and look through this
18 exhibit, sir, and tell me when you're done doing
19 that.

20 MR. BENNETT: Counsel, you say "this
21 document," but there's two pages, there's three pages
22 with different dates on them.

23 MR. FISHER: I've asked him to look through
24 the entire exhibit, Counsel.

25 MR. BENNETT: Okay.

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1 A. Yes, I've looked through it now.

2 Q. All right. Does anything in Exhibit 6
3 refresh your memory about anything that may have
4 happened at the Governor's Quality Conference on May
5 8th, 1991?

6 A. Well, the letter, which is the third item
7 in the exhibit, is consistent with my memory. It was
8 the third one, which I said, you know, it was the
9 last two or three years that we had had. And I
10 asked them to join me on May the 8th. The memo from
11 Jan Partain, who I think was in charge of this,
12 either in charge of the conference or in charge of
13 the quality program, I can't remember which, she's
14 obviously asking me, she said we'd plan for, for me
15 to begin and end the conference, and would like for
16 me to stay the entire day, and then there's this,
17 this second thing in the middle which purports to be
18 my schedule for May the 8th, but I don't know if
19 it -- it purports to be a schedule for the
20 conference, but it is different from this one you
21 gave me earlier, which appears to be the printed
22 agenda. The one -- and so I don't, in terms of my
23 level of participation, so I, I can't say. What I
24 need, I guess, to know that would be my schedule for
25 the day. And if you have my schedule for the day,

1 maybe it would say whether I was on the program. But
2 this indicates that, the Exhibit 6 you gave me
3 indicates that I was only on the program once.

4 MR. FISHER: Do you have that schedule
5 available, Mr. Bennett?

6 MR. BENNETT: Well, I don't have it here.
7 I don't know -- do we know if we've ever had it? We
8 don't know if we produced -- we'll check on it for
9 you.

10 MR. FISHER: Yes if you have it available
11 here in your office, it would be helpful. I'd
12 appreciate it.

13 MR. ETTINGER: At the break I'll show you
14 what we have.

15 MR. FISHER: Thank you.

16 A. Well, I just want to make clear, because
17 you asked me the question. This Wednesday, May 8th,
18 is not, it appears, is attached to an April 1st
19 document, and it's different. It, it calls for me to
20 participate twice. The earlier exhibit you gave me,
21 Exhibit 6, which appears to be the printed agenda,
22 which presumably was used on that day, calls for me
23 to participate once. I, I can't say what I did, and
24 maybe my daily schedule would reflect it better.

25 Q. Do you have any recollection of anyone

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1 asking you to remain at the conference all day? I'm
2 talking about the conference on May 8th, 1991.

3 A. No, not -- I don't remember anybody doing
4 that.

5 Q. Do you remember whether you left the
6 conference to go have lunch with the people from
7 Luxembourg and then return to the conference after
8 lunch?

9 A. No, sir, I don't.

10 Q. Do you recall whether at any of the
11 Governor's Quality Conferences you ever asked the
12 Excelsior Hotel to make an upstairs room available
13 for you?

14 A. No, that's not -- I mean I'll be glad to
15 talk about that if you want, but that's not the way
16 that worked. I didn't ever do it like that. I
17 didn't do that.

18 Q. When you say that's not the way that
19 worked, what do you mean?

20 A. Well, first of all, I went to the Excelsior
21 many, many times every year from the time it opened
22 until the time I left the Governor's office for
23 meetings of this kind. There were all kinds of
24 conferences, meetings, conventions there. It was a
25 big meeting place, a nice meeting place. If I had

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1 down time, that is, if I was waiting between two
2 appearances, or I got there a little early or they
3 were running a little late, and I had something I
4 needed to do, some work I needed to do, there were,
5 over the years, best I can remember, roughly I did,
6 one of three things happened. Either, if I had four
7 or five minutes, I'd just go to the standard pay
8 phones on the second floor of the convention floor
9 and make phone calls. If I had more time, or I
10 needed some desk space or some privacy sometimes
11 they would give me a little office-like space, or
12 sometimes when conventions were there, they would let
13 me use a, a suite that they had set aside for the
14 convention.

15 And frequently I remember, when that
16 happened -- that didn't happen too many times, five
17 or six times over time, but, you know, there'd be,
18 often be people coming in and out of there, they'd be
19 bringing hors d'oeuvres or something, or people would
20 be coming in and out setting up meetings because
21 they'd set aside for the convention, but it was still
22 nice enough for me, because they'd always, there was
23 a desk there, and a phone, I could write and make
24 notes, and they never bothered me any when they were
25 coming in and out, so I just didn't, that wasn't --

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1 so it is possible that they made available such a
2 space for me, but I do not believe in the whole time
3 I was Governor they ever gave me a, a suite that was
4 not already set aside for the use of the convention.
5 At least I wouldn't have known it if they did.
6 That's my belief.

7 But I was there several times sort of in
8 between times where I had a little drag time and
9 those were the three different things I remember
10 doing during those times. I don't have any specific
11 recollection of what happened on May the 8th, but
12 over a ten year period, that kind of thing happened.

13 Q. Do you recall ever, at one of the
14 Governor's Quality Conferences, asking a state
15 trooper to make arrangements to have a suite or a
16 room made available to you at the Excelsior Hotel?

17 A. No.

18 Q. Do you recall whether at any of the
19 Governor's Quality Conferences at the Excelsior Hotel
20 you ever met a woman in a suite or a room other than
21 the room where the conference was taking place?

22 A. No, I, you know, over the years I met a lot
23 of people at a lot of these meetings. I don't. Let
24 me just say, with regard to your previous question,
25 if, when the Excelsior, if they let me use a room,

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1 the trooper went up for it, to the best of my
2 knowledge the only time they ever did that is they
3 had the room set aside already for the use of the
4 convention people, but I don't have any specific
5 recollection of that on May the 8th.

6 Q. When they did have a room set aside, as you
7 just described, do you recall where in the hotel it
8 was located?

9 A. Well, they, I don't know ~~that~~ it was the
10 same place. I was -- many times I'd be at receptions
11 for these conventions and they'd, they had them in
12 suites, you know, up near the top of the hotel. I
13 don't know where they were, but, I don't remember
14 what the room numbers were or where they were on the
15 floors or anything like that.

16 Q. But do you remember that at least some of
17 them were up on one of the upper levels of the hotel?

18 A. Yes, I do. I think that's what suites are
19 in the Excelsior. I'm not sure they have them on
20 every floor.

21 Q. Now, seated to my right two chairs down is
22 Ms. Paula Jones. Do you recall ever having met her
23 before today?

24 A. No. I've said that many times. I don't.

25 Q. Do you recall ever having seen her before

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1 early 1994 when she first made public her accusations
2 against you?

3 A. No, I, I actually saw her on television
4 then, just by accident. I just happened to be
5 walking by a television in the office, and I remember
6 I asked Bruce Lindsey to come there. I said Bruce,
7 do we know this lady, who is this person? That was
8 my first surprised reaction.

9 Q. Before you saw Paula Jones on television
10 do you have any recollection of ever seeing her
11 before?

12 A. No, sir, I don't have any memory of it.
13 But you have to remember, I've met well over a
14 hundred thousand people since 1991, maybe over two
15 hundred thousand, maybe more than that. I don't
16 know.

17 MR. FISHER: Objection, nonresponsive,
18 beginning with the words. "But you have to
19 remember."

20 Q. Have you ever said to any of the state
21 troopers who were on your Security Detail when you
22 were Governor that any woman had, quote, "that
23 come-hither look," close quote?

24 A. I might well have done that. That's a
25 phrase I have used. I might well -- I don't have a

1 specific recollection of doing it, but it wouldn't
2 surprise me if I'd said that to a trooper.

3 Q. What does the phrase "that come-hither
4 look" mean?

5 A. It means either in look or dress a sort of
6 a suggestive appearance from the look or dress.

7 Q. Sexually suggestive?

8 A. Yes.

9 Q. On any of the -- strikes that

10 During any of the Governor's Quality
11 Conferences that you attended, do you recall ever
12 saying to anyone that you needed to go to a suite
13 because you were expecting a call from the White
14 House?

15 A. No, sir, I don't. I got calls from the
16 White House from time to time. I got other calls. I
17 had other business in Washington from time to time.
18 I took calls in different places than the Governor's
19 office from time to time, but I don't have any
20 specific recollection of it.

21 Q. Can you think of any reason why you would
22 have received a call from the White House in May of
23 1991?

24 A. I don't remember if I did. First of all, I
25 don't know if I did. If I did, I don't know what it

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1 was about. If you're asking me can I think of any
2 reason, there were many issues on which I basically
3 represented the Democrats and sometimes the governors
4 of the whole with the Bush administration. But I, I
5 have no specific recollection. I was one of the
6 senior governors in the country at the time, and I
7 worked with them on a lot of things, and I had people
8 call me all the time but I don't remember what
9 specific issue was going on then. 4

10 Q. You don't have a recollection of receiving
11 a call from the White House when you were at the
12 Excelsior Hotel, correct?

13 A. No, sir, I don't. I don't remember
14 anything about that.

15 Q. Now, Danny Ferguson was a member of your
16 Security Detail for several years?

17 A. Yes, he was.

18 Q. He was guarding your life and the life of
19 your wife and your daughter, correct?

20 A. He was on the Security Detail.

21 Q. And while you were Governor and he was
22 working on your Security Detail, did you ever form an
23 opinion as to his character for truthfulness?

24 A. While I was Governor, I had no reason -- I
25 was around him quite frequently, and I thought his

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1 work was entirely satisfactory, and there was no -- I
2 had nothing happen while I was Governor that would
3 cause me to question his truthfulness, if that's what
4 you're asking.

5 Q. Has your opinion as to Danny Ferguson's
6 character for truthfulness changed?

7 A. No.

8 Q. Did you ever ask Danny Ferguson to pick up
9 a gift that you were giving to a woman other than
10 your wife or a relative?

11 A. I don't recall doing that. It's possible
12 that I did. Sometimes if they were going to be out
13 and around, I'd, might ask them to do something like
14 that, but normally I didn't, but I might have done
15 that.

16 Q. While you were Governor, was there a store
17 in Little Rock named Barbara Ann's?

18 A. Barbara Jean's.

19 Q. Barbara Jean's?

20 A. Yes.

21 Q. Do you recall --

22 A. Isn't that right?

23 MR. BENNETT: Barbara Jean's is correct.

24 THE WITNESS: I think that's right.

25 MR. BENNETT: But you should not feel a

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1 moral obligation to correct his errors.

2 THE WITNESS: Go ahead. Go ahead.

3 Q. Do you recall ever sending any of the state
4 troopers who were on your Security Detail to Barbara
5 Jean's to pick up a gift that you were going to give
6 to a woman other than your wife or a relative?

7 A. No, sir, I don't, and I don't remember ever
8 giving a gift to anyone other than a member of my
9 family from that store. I knew the woman who owned
10 it, and it's possible that I did but I don't
11 remember it.

12 Q. Her name is what? The woman that owned
13 it?

14 A. Barbara -- I don't know.

15 JUDGE WRIGHT: I'm not here to testify. I
16 believe it's Barbara Baber.

17 MR. BENNETT: I object. No, I'm just
18 kidding.

19 A. I think that's right. In other words I had
20 met her, so I knew who she was, so I, I guess what,
21 the reason I said that is, I believe I shopped there
22 rarely, but on occasion, over a ten-year period, but
23 I have no recollection of buying a gift for anyone
24 other than a member of my family there.

25 Q. Did you ever send a state trooper who was a

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1 member of your Security Detail to any store to pick
2 up a gift for a woman other than your wife or a
3 relative?

4 A. I have no specific recollection of doing
5 that. I wouldn't -- it's possible that it happened,
6 but I don't remember.

7 Q. Now, after you took office as President,
8 did you ever have any telephone conversations with
9 Danny Ferguson?

10 A. Yes, I did.

11 Q. How many?

12 A. I'm not sure. I think two or three. I
13 have some notes there, which I know you've been
14 given, but I'm not --

15 MR. BENNETT: Just answer the question --

16 A. I'm not sure.

17 MR. BENNETT: -- Mr. President.

18 Q. Without consulting your notes, do you have
19 any independent recollection of anything that was
20 said in any of those conversations with Danny
21 Ferguson?

22 A. I sure do.

23 Q. Okay. What is that recollection?

24 A. Well, he called my secretary in Little
25 Rock, Linda Dixon, and asked me to call him, and I

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1 was afraid, you know, I thought there was something,
2 he had some personal problem. I didn't have any idea
3 what he wanted to talk to me about.

4 MR. BENNETT: Mr. President, excuse me,
5 keep your voice up, please, so the Judge hears you.

6 A. I didn't have any idea what he wanted to
7 talk to me about, and when I called him he wanted to
8 talk to me about the what have now become famous as
9 the so-called trooper stories to The American
10 Spectator. And he said he acknowledged either at
11 some point during these conversations that he had
12 been a part of the, at least had met with one or two
13 reporters and a Republican lawyer in Arkansas. He
14 said that the troopers had been offered seven hundred
15 thousand dollars in hundred thousand dollar a year
16 increments for jobs that they would take as soon as
17 they could leave the state police out of the State of
18 Arkansas, plus whatever other money they could earn
19 in books and incomes up to a million dollars if they
20 would trash me. He further said that they were told
21 in no uncertain terms that what they said about me
22 did not have to be true, it's just that two of them
23 had to tell the same story, and if three of them told
24 the story they could get it printed anywhere, whether
25 it was true or not.

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1 He then said that the troopers who talked
2 to them, principally Patterson and Perry, obviously
3 didn't know anything, and that basically, I remember
4 very well, he said there's basically two kinds of
5 lies in these stories, there's the stuff we just made
6 up out of whole cloth, and he said then there's the
7 stuff that happened that we twisted to make it look
8 as bad as possible. And he said I'm out of here, I'm
9 not going to do this, and I said well, why don't you
10 say it's not true? He said I can't do that, they'll
11 get me if I do. I don't know what he meant by that.
12 But that's a summary of what he said. And that's
13 consistent with my experience with The American
14 Spectator types over the last six years, and what I
15 was told would happen if I ran for President.

16 MR. FISHER: Objection, nonresponsive
17 beginning with the words --[^]

18 JUDGE WRIGHT: Let me, I have not been
19 ruling on your objections because this is a
20 deposition, I didn't think you wanted me to rule, you
21 were just making your record, but since I am here, I
22 will say that it is improper for the witness to go on
23 and comment such as he just did. It's also of course
24 improper for you to make comments, so to that extent
25 that objection would have been sustained, and that's

1 all I'm going to say. Go ahead.

2 Q. Approximately when did the conversation you
3 just described take place?

4 A. Well, it would have been, at least the
5 first conversation would have been sometime I guess
6 in -- maybe my notes reflect it, I don't really
7 remember, but sometime in mid-1993, late, summertime
8 1993, maybe something like that. It was before Ms.
9 Jones made her statement. Because there was no
10 discussion of her in it

11 Q. Now, the testimony you just gave about what
12 Danny Ferguson said, was that relating the content of
13 one conversation, or was that more than --

14 A. I don't remember. You, you've got the,
15 you've got the notes there, and they will, they
16 probably reflect whether it was one or two or three
17 conversations.

18 MR. FISHER: Would you mark that, please.

19 (Exhibit 8 marked.)

20 Q. Sir, I'm handing you what has been marked
21 as Deposition Exhibit 8.

22 Ignoring the fax information at the top of
23 each page, can you identify the typed words on this
24 document as a transcription of your notes of
25 conversations with Danny Ferguson?

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1 A. That's what they appear to be. Have you
2 got a copy of the, my handwritten notes?

3 Q. I do, but not with me.

4 A. That's what it appears to me. I don't
5 remember verbatim what's in my handwritten notes.

6 Q. Did you look at the transcription before
7 your deposition today?

8 A. I'm not sure I did, actually, but I helped
9 to prepare it because there were a couple of words
10 that the people who prepared the transcription
11 couldn't read. Or a couple of words I had trouble
12 reading. My handwriting's not very good, but --

13 Q. Look through Exhibit 8, if you would, sir,
14 and tell me whether you see anything there that looks
15 like it was not what you wrote?

16 A. No. This is -- it looks very much like --
17 what is typed here seems, is reminiscent of what I
18 wrote in my handwriting. I just don't have the
19 handwriting here and can't be for sure.

20 Q. How many separate calls are reflected in
21 these notes?

22 MR. BENNETT: Well, excuse me, Your Honor.
23 We have provided the original of the notes, and if
24 Your Honor even looks at this typed transcription,
25 you can see even in this transcription all of the

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1 words are not clear. I would suggest they show the
2 original notes to the witness or at least provide
3 both to him before they ask questions.

4 JUDGE WRIGHT: All right, go on and show
5 him the original notes, but the question with respect
6 to the number of conversations is all right.

7 That's --

8 A. I believe there were. I believe there were
9 two conversations, although there ~~could~~ have been
10 three and I honestly don't recall. When I looked at
11 my notes many, many months later it appears to me
12 that there were two conversations.

13 (Exhibit 9 marked.)

14 A. Mr. Ferguson might have a better memory
15 than I do. I don't know what he said about it.

16 Q. Sir, I'm handing you what has been marked
17 as Deposition Exhibit 9. As you can see it bears the
18 caption of this case and is entitled President
19 Clinton's Responses to Plaintiff's Third Set of
20 Interrogatories.

21 A. Yes.

22 Q. Are your notes attached to the back of this
23 document?

24 A. Excuse me, let me see. Yes, they are.

25 Q. Okay. And there are four pages of notes,

1 correct?

2 A. Yes, that's correct.

3 Q. These are all in your handwriting?

4 A. Yes, they are.

5 Q. Upon examination of these notes, can you
6 tell us how many conversations with Danny Ferguson
7 are reflected here?

8 A. It -- as I said, it appears to me that
9 there are two, but the last -- but it's possible I
10 suppose that there are three because I'd had to do
11 a very neat job of enumerating the pages. I believe
12 there are two. I don't know for sure.

13 Q. Is there any document in your possession
14 that you're aware of that would reveal the date on
15 which each of the conversations took place?

16 A. Not unless the White House operator or
17 the -- not unless we have some White House document
18 that reflected when that, when the call was made. I
19 just don't know if we do, but I know the first one
20 was sometime in the latter half of 1993, and I'm not
21 -- and the second one was sometime thereafter, and
22 apparently before The American Spectator story was
23 published.

24 Q. Who found these notes?

25 A. I think I had them. I just was sort of

1 scribbling them off and I, and I had them. I put
2 them back somewhere.

3 Q. Where did you put them?

4 A. I'm not sure. I think I had them either in
5 a -- I'm not sure where they were. I had them put
6 away someplace.

7 Q. Were they in a file folder?

8 A. I believe they were. I'm not sure.

9 Q. What was the title or label on the file?

10 A. I don't think there was a title or label on
11 the file. They were just notes that I made to myself
12 when I was scribbling off in a hurry talking to
13 Danny.

14 Q. Were there any other documents in the file
15 with these notes?

16 A. No. I had them separate. These are the
17 only phone conversations I had like this. I gave
18 them to my counsel some time ago, so I just don't
19 remember where I had them at the time I gave them to
20 him.

21 Q. Where is the file from which the original
22 notes were taken currently located?

23 A. There wasn't -- they were just in a
24 folder. I don't know what happened to the folder. I
25 don't know if they have the folder. I don't know

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1 what happened to the folder. There was no file with
2 a name and a big file box or anything. I just put
3 these notes aside.

4 Q. After you became President, did you have
5 any conversations with Danny Ferguson for which you
6 kept no notes?

7 A. Not that I recall. I, I believe I ran into
8 him and said hello at the in Seattle at the I
9 believe he was with Governor Tucker in Seattle at the
10 Asian Pacific leaders meeting. at least he might have
11 been. whoever was there. whatever troopers were there
12 with him, with the Governor, I stopped and said hi to
13 them, but that was it, that was the extent of it, so
14 if he was one of those troopers, then I did say
15 that. I didn't keep a note of that. I don't believe
16 there was any other conversation for which I kept no
17 note. If I did have one, I don't remember it.

18 Q. On that occasion in Seattle, did you talk
19 to Danny Ferguson about this lawsuit?

20 A. No, sir. I didn't.

21 Q. Did you talk to Danny Ferguson about Paula
22 Jones?

23 A. No. I don't have any recollection of
24 that. I think that was before the Paula Jones matter
25 came out. I believe it was. I don't remember, but I

1 don't, I don't have any recollection of talking to
2 Danny Ferguson about any of this. I think I just
3 said -- if he was there I think I just said hello to
4 whatever the security people that were there with the
5 Governor.

6 Q. Did you talk to Danny Ferguson about
7 stories being told by any other state troopers who
8 had been on your Security Detail?

9 A. In Seattle?

10 Q. Yeah.

11 A. I don't believe so, no, sir.

12 Q. So that possible conversation in Seattle
13 and the conversations reflected in your notes here,
14 which are a part of Deposition Exhibit 9, those would
15 be all the conversations you remember having with
16 Danny Ferguson since you became President, correct?

17 A. To the best of my memory. I would not --
18 but I could well have talked to him another time, I'm
19 just telling you what my memory is. I've had several
20 thousand phone calls. I'm giving you the best of my
21 memory.

22 Q. Do you recall Danny Ferguson ever telling
23 you that he had given an interview to a reporter with
24 the Los Angeles Times?

25 A. I recall Danny Ferguson saying that he was,

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1 he met with a lawyer and three other troopers, and I
2 don't remember whether he said that the reporters
3 were there or not. You see that there's an L.A.
4 Times reporter mentioned in the second phone call
5 there. I don't know if I can tell from the notes
6 whether he actually met with him or not.

7 Q. Which page of the notes are you looking at
8 now?

9 A. Page, third -- the first page of the second
10 column.

11 Q. In the transcription, which of the four
12 pages is that?

13 A. The third.

14 Q. Okay. You're talking about the reference
15 to L.A. Times reporter Bill Rempel (sic)?

16 A. Yes.

17 Q. Did Danny Ferguson⁴ ever say to you that he,
18 Danny Ferguson, had made untrue statements to the
19 L.A. Times reporter?

20 A. He said exactly what these notes reflect.
21 And you can draw whatever inference from them you
22 want. He said exactly what these notes reflect. As
23 I, if you look on page one, I said he was hedging on
24 how much he said but clearly shared rumors, made up
25 stuff, talked about how they were angry because I

1 didn't give them jobs.

2 MR. BENNETT: Keep your voice up, Mr.
3 President.

4 A. And had some other rumors. He said he and
5 his wife were trying to stop the rumors. He said he
6 went to the first meeting to see what they were doing
7 and he played along with them, that's what he said to
8 me. I said it's not true, he says he knows but he
9 wants to stay out of it. And I'm ~~guess~~, I wrote down
10 here what he said. Then he said that he was
11 threatened by the -- that he felt threatened and
12 under pressure, and then he said that the L.A. Times
13 reporter threatened him. That's all, you know, I
14 have no memory independent of these notes that I took
15 here.

16 Q. All right. Now, on the first page where
17 you wrote, and I quote, "hedging on how much he said
18 but clearly shared rumors, made stuff up," end quote
19 did you understand that it was Danny Ferguson who
20 made stuff up?

21 A. I understood he said to me that they made
22 stuff up. It was clear to me that he had at least
23 gone to the meeting and at least in silence gone
24 along with whatever was done in the beginning, which
25 he later acknowledged doing, and all I can tell you

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1 is what he told me there. He said, he said they were
2 encouraged to be as negative as possible, they were
3 told they didn't have to tell the truth, they were
4 told all they had to do was to get two or more people
5 to agree, and if they got three people to say the
6 same thing, anybody in the world would print it,
7 didn't matter if it was true or not, and there was a
8 lot of money in it for them if they did it, that's
9 what he told me, and then he said he ^{just}, he didn't
10 didn't want to be a part of it didn't want the
11 money, wanted out, wished it had never happened but
12 he didn't feel like he could ever contradict
13 anything, which I gather meant that he had
14 participated. That's all I know.

15 Q. Did he ever tell you that he had talked to
16 a reporter named David Brock?

17 A. David Brock's name is mentioned here. He
18 never -- he wasn't specific with me about what he
19 said to Brock or what he said to Rummel (sic) or what
20 he sat in the room and listened to others say and
21 didn't contradict. He was never specific about
22 that.

23 Q. Now, Buddy Young was a state trooper who
24 was assigned to your Security Detail at some point,
25 correct?

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1 A. He was the head of Governor's security.

2 Q. And after you became President, you
3 appointed him to a position in the federal
4 government, correct?

5 A. He was appointed regional director of the
6 Federal Emergency Management Agency, and most of
7 those regional directorships are presidential
8 appointments, so I assume that was a White House
9 appointment. I'm not positive, but I assume it was
10 Most regional jobs are with most departments.

11 Q. Before that appointment, did he ever
12 express an interest to you in receiving a federal
13 job?

14 A. Yes, he said he could take retirement from
15 the state police, and he was ready to do so, that
16 he'd put in his time and he would like to get out.

17 Q. Did he say that to you before or after you
18 took office as President?

19 A. I believe after I -- I believe it was
20 before I took office. I was actually surprised. I
21 think Buddy Young was the youngest captain in the
22 state police and a very able officer. I was rather
23 surprised he wanted to leave. He probably could have
24 become the commander of the state police.

25 MR. FISHER: Objection, nonresponsive

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1 Q. Have you looked to see whether you have any
2 such notes?

3 A. I don't think I have any other notes. I've
4 tried to find any notes that would be responsive to
5 your request for production. We've given you some
6 other notes that I have. I don't, I don't think I
7 have anymore. And I have no recollection of taking
8 any.

9 Q. After you became President, did you ever
10 ask Buddy Young to talk to any of the state troopers
11 who had been on your Security Detail when you were
12 Governor?

13 A. I, I believe, actually I think I did. No,
14 wait a minute, after I became President?

15 Q. Yes.

16 A. Back up. I had a conversation with Buddy
17 Young in which I asked him if he knew anything about
18 this purported -- this meeting that Danny Ferguson
19 described with himself and the other three troopers,
20 the two reporters, Cliff Jackson, and another
21 Republican lawyer. I don't recall asking him to
22 speak to any of them. I think I was more interested
23 in asking if he knew anything about it or what it
24 precipitated, and I had a conversation like that.

25 Q. After that conversation, did Buddy Young

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1 ever report back to you that he had spoken to some of
2 the state troopers?

3 A. I don't know that I recall that. I seem to
4 recall that he, that I learned that he did speak to
5 some, one state trooper, either one of the ones
6 involved or another state trooper, to try to get some
7 information about what had happened, but that's all I
8 remember, and I don't. I'm not even sure he told me
9 that.

10 Q. With regard to the previous conversation
11 that you had with Buddy Young you've described a few
12 moments ago, in which you talked to him about the
13 meeting that some state troopers had had with
14 reporters, did you ask him to do anything in
15 particular?

16 A. Not that I recall, except I asked him if he
17 knew, you know, what was going on, what the deal
18 was.

19 Q. What did he say?

20 A. At the time I called him, I don't believe
21 he did know anything about it. He might have. I
22 don't, as I said, a lot of water's washed under the
23 bridge. I'm not sure that I remember exactly, but I
24 do not believe he knew anything about it at the time
25 I called.

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1 Q. Have any notes of that conversation with
2 Buddy Young been destroyed?

3 A. No, sir. I didn't -- I just don't think I
4 made any notes.

5 MR. BENNETT: Want to take a short break?

6 MR. FISHER: Gone about ninety minutes
7 since the last one.

8 JUDGE WRIGHT: Yeah, that's fine. We'll
9 take a break for ten minutes.

10 THE WITNESS: Thank you

11 (Short recess.)

12 Q. Sir, I wanted to ask you a couple of quick
13 questions about the third page of your notes, the
14 transcribed version of which is Exhibit --

15 A. Okay.

16 Q. -- 8.

17 A. All right.

18 Q. Toward the bottom of that page is typed GJ,
19 I'm sorry, "JGT real upset." Who is JGT?

20 A. Jim Guy Tucker, he was the Governor.

21 Q. Do you recall what Danny Ferguson said
22 about Jim Guy Tucker being upset?

23 A. Yes, he said that the Governor thought it
24 was inappropriate for members of the Governor's
25 Security Detail to be talking to The American

1 Spectator for money. Thought that was inappropriate
2 with their responsibilities.

3 MR. BENNETT: Could you keep your voice up,
4 Mr. President.

5 A. Excuse me, inconsistent with their
6 responsibilities, and he thought it was an
7 inappropriate thing to do and it upset him.

8 Q. Did he say that Jim Guy Tucker intended to
9 do anything about it?

10 A. Not that I recall.

11 Q. To your knowledge, did Jim Guy Tucker ever
12 do anything about it?

13 A. I don't know.

14 Q. A little further up on the page, sir, there
15 is a reference, and I quote, "tried to get old sec.
16 together," what does that mean, please?

17 A. Security.

18 Q. "Invited J. Spear and M. Koberlin," who are
19 they?

20 A. Jackie Spear and Mike Koberlin are two
21 people who had also worked at the Governor's Mansion
22 previously, and apparently Brock and Cliff Jackson
23 and the others had invited them.

24 Q. Did Danny Ferguson say that he had spoken
25 to either or both of them?

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1 A. Not that I remember. All I, all I can say
2 is what's in the notes here.

3 Q. Okay.

4 A. I don't know how he knew that.

5 Q. Those are all the questions I have about
6 the notes, thank you.

7 During any of the Governor's Conferences at
8 the Excelsior Hotel, do you recall ever asking a
9 state trooper to make arrangements for a woman to
10 meet you in a suite or room?

11 A. I don't recall that, no.

12 Q. During any other state business at the
13 Excelsior Hotel -- I mean, by other I mean not a
14 Governor's Quality Conference but other state
15 function there at the hotel -- did you ever ask a
16 state trooper to make arrangements for a woman to
17 meet you in a room or suite?

18 A. Not that I recall.

19 Q. Do you know a woman named Sheila Lawrence?

20 A. I do.

21 Q. Is she an employee of the federal
22 government?

23 A. No.

24 Q. Was she?

25 A. Well, let me see. Her husband, her late

1 husband, was our ambassador to Switzerland, and
2 during that time she undertook some appointment I
3 gave her during, and it may have been a paid
4 appointment, she may have been. If you could ask me
5 a question or give me more information, maybe I could
6 give you a better answer. I'm just not sure whether
7 it was an appointed position without pay or a paid
8 position.

9 Q. If I could remember the position, I would
10 do that, sir, but it slips my mind at the moment.
11 Did you appoint her to that position?

12 A. Well, she was appointed during my
13 presidency, and I'm sure under my authority. I
14 don't, I don't remember making the decision or,
15 initially, but I'm sure someone recommended it and I
16 went along with it.

17 Q. Now, have you ever spent the night at a
18 home owned by Sheila Lawrence?

19 A. Yes, I have.

20 Q. Was that in Jackson Hole, Wyoming?

21 A. No.

22 Q. Where was it located?

23 A. It was located in San Diego, California.

24 Q. And was that while you were President of
25 the United States?

1 A. Yes.

2 Q. Was it before or after her appointment to
3 the position that I can't remember?

4 A. I don't remember. My family and I actually
5 stayed at her home for several days on vacation a
6 couple years ago. I don't remember whether it was
7 before or after, and then there was at least one
8 other occasion when I spent the night there. I don't
9 remember when it was or whether it was before or
10 after.

11 Q. Did you ever stay in the home of Sheila
12 Lawrence when your wife was not with you?

13 A. I believe I did once. I believe, I believe
14 I did. I do not remember for sure. I believe I
15 stayed there once when she was not with me.

16 Q. On -- excuse me for interrupting.

17 A. I think Bruce Lindsey was with me.

18 Q. On that occasion did you have sexual
19 relations with Sheila Lawrence?

20 A. Absolutely not.

21 Q. Have you ever at any time or any location
22 had sexual relations with Sheila Lawrence?

23 A. Never.

24 Q. Did you ever attend a party at the Hotel
25 del Coronado which was attended by Sheila Lawrence?

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1 A. She and her husband owned the hotel, and I
2 went to several events there, and I think they were
3 there for most of the events I attended.

4 Q. On any of those occasions were you in one
5 of the rooms of the hotel alone with her?

6 A. I don't believe so.

7 Q. And when you were Governor of the State of
8 Arkansas, you appointed Beth Coulson to the position
9 of Judge on the Arkansas Court of Appeals, correct?

10 A. I did yes

11 Q. And she decided cases on the Court of
12 Appeals for two years, correct?

13 A. That's correct. It was a newly created
14 Court, and I appointed her to a position on it.

15 Q. Do you recall when that appointment was
16 made?

17 A. No.

18 Q. Now, if she testified that while you were
19 Governor you visited her home on more than one
20 occasion when her husband was not there, would that
21 testimony be true?

22 A. Yes.

23 Q. About how many times did you visit the home
24 of Beth Coulson when her husband was not there?

25 A. I'm not sure. Probably, I don't know, four

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1 or five, over a ten-year period, maybe a few more,
2 maybe a few less, I don't know, several times.

3 Q. And on those occasions, on any of those
4 occasions, were you alone in the house with Beth
5 Coulson, or were there other people there in the
6 house with you?

7 A. No, those are -- I answered the question
8 you asked me, on those occasions she was there and I
9 was there alone.

10 Q. Were you driven to her house by a state
11 trooper?

12 A. Yes.

13 Q. On any occasions did the state trooper come
14 into the house with you?

15 A. I don't remember. Usually when state
16 troopers drove me places like the homes, they didn't
17 go in with me.

18 Q. Okay. What would they typically do?

19 A. Stay outside, look around, see what was
20 going to happen. They normally didn't go inside with
21 me.

22 Q. Did you ever send them off to run errands
23 on those occasions when you were in the house alone
24 with Beth Coulson?

25 A. I don't believe so. I don't remember doing

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1 that.

2 Q. What was the purpose of these visits to
3 Beth Coulson's house when her husband was not there?

4 A. The fact that her husband was not there was
5 incidental. She was a friend of mine, and I would go
6 by and see her from time to time. I hadn't been
7 visiting with her in a long time. Sometimes I saw
8 him when she wasn't there. He was a friend of mine.
9 too.

10 Q. So the purpose was purely social?

11 A. That's right.

12 Q. Did you ever --

13 A. I say the purpose was purely social, there
14 may have been times when we discussed political
15 issues or some other issues. I don't know that they
16 were purely social, but they were personal.

17 Q. Were any of those visits that you had with
18 Beth Coulson at her home when no one else was in the
19 home with you at night?

20 A. You know, I don't remember going there at
21 night. I may have. I couldn't say that I didn't. I
22 believe the vast majority were in the daylight
23 hours. But I can't say that I was never there at
24 night when they weren't both there. I just don't
25 remember.

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1 Q. Did you ever have sexual relations with
2 Beth Coulson?

3 A. No.

4 Q. At any location?

5 A. No.

6 Q. What were her qualifications to serve as a
7 Judge in the Court of Appeals?

8 A. She was an intelligent, hard-working person
9 who was a good friend and supporter of mine. And I
10 thought she would make a good judge. The evidence is
11 that she did, I think.

12 MR. FISHER: Objection, nonresponsive
13 beginning with the words, "The evidence is."

14 JUDGE WRIGHT: I'll sustain. Go ahead.

15 Q. Had she ever argued even a single case in
16 the Court of Appeals before you appointed her?

17 A. I don't think there was a Court of Appeals
18 before I appointed her, so the answer to that would
19 be no, but that would put her in the same boat with
20 every other judge. The Court of Appeals was a newly
21 appointed court. The judges were to be elected but I
22 had to appoint the first batch so it could sit and
23 begin to decide cases, and then there was a system
24 for electing them. After that they were all
25 elected. That's the way they are now, except when a

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1 vacancy occurs, and the Governor appoints just for
2 the remainder of the term.

3 Q. Isn't it a fact that you appointed her to
4 fill the unexpired term of another judge who was
5 moving on to the Arkansas Supreme Court?

6 A. That could be. That could be. I didn't
7 remember. I was thinking I did it at the beginning
8 of the term, but you're probably, but you're right
9 about that. I'm sorry. I'd forgotten about that.

10 Q. Do you recall an occasion when you and Beth
11 Coulson drove together from the airport to the
12 Governor's Mansion in her Jaguar?

13 A. Yes, I remember that.

14 Q. And she let you drive the Jaguar, correct?

15 A. She did.

16 Q. Was there a state trooper in another car
17 driving ahead of you?

18 A. Well, there must have been. I remember the
19 circumstances of that day quite well, and so I, there
20 would have been a trooper with me all day, so if, if
21 I got to drive the Jaguar, which I wanted to do --

22 MR. BENNETT: Keep your voice up.

23 A. If I got to drive the Jaguar, which I
24 wanted to do, then the trooper would have been either
25 behind or just ahead of me, that's what they always

1 did. I didn't drive much like that, but it was too
2 good an opportunity to pass up. I'd never driven a
3 Jaguar before.

4 Q. You said that you remembered the
5 circumstances of that day very well. What do you
6 remember happening on that day?

7 A. A good friend of hers and mine, Rudy Moore,
8 who was my first chief of staff, son was killed in a
9 tragic car accident in his senior year in high
10 school. I wanted to fly up and see him and she
11 wanted to go with him, and they were very close, and
12 my recollection is it was on that trip when we got
13 back to Little Rock after going up to see him that
14 either she said do you want to drive the Jaguar or I
15 said can I do it. We were both really profoundly
16 sad, and we both cared a lot about the guy and about
17 his son, and it was a very sad day. I remember it
18 very well.

19 Q. Did you fly together in a, an airplane?

20 A. That's correct. She, she flew with me up
21 there.

22 Q. Is that a commercial aircraft or a
23 chartered airplane or a --

24 A. I think it was a private airplane. I think
25 it was one we, that we either chartered or borrowed

1 to go up there. I don't believe it was one of the
2 state planes. It could have been. I don't remember
3 what plane it was, to be honest with you.

4 Q. Do you recall who was on the plane with
5 you?

6 A. No, there would have been a trooper on the
7 plane. There might have been other people on the
8 plane as well. There were -- Rudy had other, a lot
9 of other friends in Little Rock. I just don't
10 remember whether anyone else went.

11 Q. Do you know a woman named Marilyn Jo
12 Jenkins?

13 A. I do.

14 Q. Do you recall her visiting you at the
15 Governor's Mansion between the time that you were
16 elected President and the time that you moved to
17 Washington to take office?

18 A. I do.

19 Q. On how many occasions in that time span did
20 she visit with you at the Governor's Mansion?

21 A. I believe she was there twice. I believe
22 she was there twice.

23 Q. Was one of those occasions the early
24 morning of the day that you left to go to
25 Washington?

1 A. I don't -- well, I don't know. She came by
2 early in the morning, either the day I left or the
3 day before that, sometime around then. She wanted to
4 come by and say goodbye, and she had to go somewhere
5 else. She came by early, I was up. I don't
6 remember, I honestly don't remember what exact day it
7 was, but it was close to the time I left.

8 Q. Do you recall that Danny Ferguson was with
9 you when she arrived?

10 A. I don't have an independent recollection of
11 that. I know what the testimony was, but I don't
12 actually have an independent memory of that.

13 Q. Where did you meet with her on that day?

14 A. I believe in the basement, which we were
15 sort of using as the all-purpose office at the time,
16 and which was full to the gills of all kinds of
17 things that were being sent in from all over America,
18 but it was kind of an around-the-clock office for
19 us.

20 Q. Was that basement room sometimes referred
21 to as a game room?

22 A. Perhaps.

23 Q. And while you were talking to Marilyn Jo
24 Jenkins, was anyone else in the game room with you?

25 A. No. I don't believe anybody was there.

1 Q. Was Danny Ferguson outside the game room in
2 an adjoining room?

3 A. I don't, I don't know where he was. I've
4 already said I don't remember having an independent
5 recollection who was there that day.

6 Q. Okay. You said you remembered you thought
7 two occasions when you were President-Elect that she
8 visited you at the Governor's Mansion. When was the
9 first of them?

10 A. I don't remember exactly when it was, but I
11 just have a vague memory that she came by once before
12 Christmas, and I gave her some gifts for her children
13 and herself. I believe that's right. I just -- I've
14 been trying to think. I think, I'm almost positive
15 there were only two times, and I believe those, I
16 think those were the two occasions. I'm quite sure
17 she was there early in the morning shortly before I
18 left, and I believe she was there one other time, and
19 I believe, but I'm not sure, that's why she was
20 there. That's all I know about that.

21 Q. Okay. On the first of those two occasions,
22 what time of day did you meet?

23 A. I don't remember.

24 Q. Do you remember if it was dark outside?

25 A. No.

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1 Q. Where did you meet with her on that
2 occasion?

3 A. I don't remember.

4 Q. Do you remember whether anyone else was
5 with you when you met with her?

6 A. No, but -- I don't remember, I don't
7 remember. I, I assume not, but I don't remember
8 really. I don't know.

9 MR. BENNETT: Don't assume, Mr. President.

10 A. I don't know.

11 Q. Did you ever meet with Marilyn Jo Jenkins
12 at her apartment? And I'm not just asking about the
13 time when you were President-Elect, but any time when
14 you were Governor?

15 A. I have been to her place.

16 Q. It was located at the Riviera Apartments;
17 is that correct?

18 A. I don't believe that's right.

19 Q. What were the apartments called where she
20 lived?

21 A. I don't remember.

22 Q. When you visited her place, as you put it,
23 were you accompanied by a state trooper?

24 A. I don't remember. I'm not sure I was.

25 Q. Were you Governor at the time?

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1 A. Yes.

2 Q. How many times did you visit the apartment
3 of Marilyn Jo Jenkins when you were Governor?

4 A. I don't know. I can't -- I don't know.

5 Q. More than ten?

6 A. I'm not sure I was there more than ten
7 times, no. I don't know how many times, but I doubt
8 if I was there more than ten times. I'm pretty sure
9 I was there fewer than ten times".

10 Q. Is it your testimony that you were never
11 accompanied by a trooper on any of those occasions
12 when you went to her apartment?

13 A. My testimony is that I do not remember any
14 trooper ever taking me to her apartment.

15 Q. Do you recall ever asking a trooper to pick
16 up some gifts to be given to Marilyn Jo Jenkins?

17 A. No, sir, I don't. I don't remember that.

18 Q. Is it possible? Or are you certain that it
19 did not happen?

20 A. No, I'm not certain. I don't recall.

21 Q. You mentioned that when she visited you in
22 the early morning, shortly before you left for
23 Washington, you gave her some gifts. What were those
24 gifts?

25 A. I don't even remember. I thought I

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1 mentioned that I gave her some gifts the first tim
2 she came for a Christmas present, but I don't
3 remember what they were.

4 Q. Did Marilyn Jo Jenkins live in the Shadow
5 Oaks Apartments?

6 A. I don't know. Where are they?

7 Q. I have no idea. That doesn't ring a bell

8 A. That may be where she lives. I just -- I
9 don't remember. I remember where the place is.

10 Q. Have you ever talked to Marilyn Jo Jenkins
11 about the Paula Jones case?

12 A. You know, I'm not sure. I might have. If
13 I have, I -- everybody I've talked to about it I jus
14 said I didn't do what Ms. Jones said I did.

15 Q. Sir, do you have a recollection of talking
16 to Marilyn Jo Jenkins about it, or are you just
17 saying it's possible?

18 A. Well, I've talked to her maybe on two
19 occasions in the, in the intervening time period,
20 maybe three, and I assume that I said something about
21 it, but I, I -- that's what I would have said about
22 it.

23 Q. Did you ever talk to her about the
24 possibility that she might be called to testify in
25 the case?

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1 A. I'm not sure. The reason I ask you that
2 is, the answer, that is I just, I think that, I think
3 that when I talked to her last she had not been
4 called. I don't know if I talked to her about the
5 possibility of ever being called or not.

6 Q. Did you talk to her on the telephone on
7 that occasion?

8 MR. BENNETT: You mean if he had talked to
9 her? I mean --

10 A. It was a long -- yeah I'm trying to
11 remember, it was a long time ago. I'm trying to -- I
12 don't remember. I think so.

13 Q. Well, since you took office as President,
14 you have spoken to Marilyn Jo Jenkins?

15 A. I have.

16 Q. With regard to those conversations that you
17 do recall, were they on the telephone or in person?

18 A. I think, I think both.

19 Q. Okay.

20 A. That is I -- but brief.

21 Q. Have you ever called her from the White
22 House?

23 A. Yes.

24 Q. Was that the occasion when you talked to
25 her about the Paula Jones case?

1 A. I don't think so. I think -- I'm trying, I
2 don't remember when the last time I talked to her
3 was. If it happened before 1994 and this came up I
4 would have said something about it, just in passing,
5 the way I would to anybody I talked to.

6 MR. BENNETT: Keep your voice up, Mr.
7 President.

8 A. But I don't, I do not recall when the last
9 time I talked to her was.

10 Q Now with regard to the conversation that
11 you had with her in person after you became
12 President, where did that conversation take place?

13 A. Well, let me see. I saw her once at a
14 political rally, or twice at two different things I
15 did in Arkansas, public rally. Just said hello to
16 her. She was there in the crowd, I stopped and said
17 hello. And she was -- I'm trying to remember where,
18 if I'd seen her any other time. I remember those two
19 times. I think that's, I think that's it.

20 Q. Okay. And in that face-to-face meeting you
21 just described, was there any discussion about the
22 possibility that she might be called on to testify?

23 A. No, sir, huh-uh.

24 MR. BENNETT: You have to answer, you can't
25 say huh-uh.

1 A. No, I said no, there was not.

2 Q. Have you ever paid any money to Marilyn Jo
3 Jenkins?

4 A. No, sir.

5 Q. Has she ever asked you to pay her money in
6 order to induce her to keep quiet about anything?

7 A. No, sir.

8 MR. BENNETT: Now, Your Honor --

9 A. Absolutely not.

10 MR. BENNETT: I'm just going to object
11 because I don't think this is a good faith
12 representation. I just want that on the record, Your
13 Honor.

14 JUDGE WRIGHT: Sure. I have no way of
15 knowing, as you know, and I'm giving him the benefit
16 of the doubt as I do all lawyers.

17 MR. BENNETT: But at some point this may go
18 to trial and --

19 JUDGE WRIGHT: Absolutely.

20 Q. At the Governor's Mansion did you ever have
21 sexual relations with Marilyn Jo Jenkins?

22 MR. BENNETT: Objection, Your Honor.

23 JUDGE WRIGHT: All right, sustained. Now
24 again I'm going to state for the record for people
25 who have not read the record or haven't been present

1 before. The Court has ruled that the, the gist of
2 this case is a sexual harassment case, and the
3 principal cause of action is against the Governor, or
4 I should say the President when he was Governor, and
5 the 1985 action includes the trooper, Danny Ferguson,
6 and they are accused of being state actors, and Paula
7 Jones is allegedly a state employee, or she was a
8 state employee during that time. Therefore, this
9 Court has required that before the question and I'm
10 talking about the sexual relations question can be
11 asked, of three Jane Does who have been deposed,
12 before that question can be asked of them, it must be
13 established that either Mr. Clinton made an unwelcome
14 sexual advance to them, because that's what Ms. Jones
15 is alleging happened to her, ~~or~~ that they somehow be
16 employees, in other words they were either employees
17 then or earlier or afterwards, or they applied for
18 employment or were trying to get employment. There
19 has to be some employment nexus because the essence
20 of this case is an employment case.

21 So far, there have been absolutely no
22 indication, or has been no indication that Ms.
23 Jenkins was the recipient of an unwanted sexual
24 advance, or that she was ever seeking employment or
25 ever had employment by, by the State of Arkansas, or

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1 for that matter by the federal government.

2 Now, we've discussed, and have I struggled
3 with this question, as Counsel know. Because the
4 Governor is always in the protection of the state
5 troopers, it is sometimes difficult for me to say
6 well, the trooper nexus is there or the trooper nexus
7 is not sufficient. Governor Clinton, as every
8 governor I've ever known, has the right to use
9 troopers for personal business as well as for
10 official business. If he has a sore throat, he can
11 send the trooper out for a cough lozenge. If he
12 needs to go to dinner, they take him to dinner, the
13 way the marshals take a judge sometimes to dinner,
14 that's just the way it is. Therefore just the simple
15 fact that a trooper might have been standing at the
16 guard gate at the Governor's Mansion to admit a woman
17 is not sufficient nexus.

18 Now I realize that you want to make an
19 objection on the record here today, Mr. Fisher, with
20 respect to any sexual relationship notwithstanding
21 the employment nexus because, you say, it should not
22 be up to Mr. Clinton to say whether a sexual advance
23 is or is not welcome, and I will grant you that
24 frequently what men believe is welcome a woman will
25 say is not welcome, or maybe for that matter the

1 reverse, although I haven't heard of it.

2 Now, even though I would ordinarily permit
3 this, because of the lateness in the discovery
4 period, because you do have other evidence, and
5 because this man is the President and I am limiting
6 the scope of your discovery in accordance with the
7 wide discretion given me, I'm going to overrule that,
8 that request. In other words, I'm not going to grant
9 it. So now it's on the record in this deposition,
10 it's also on the record in many other places frankly
11 in this, in this matter. But I am not going to
12 because there is absolutely nothing there to indicate
13 that Ms. Jenkins was ever an employee or seeking
14 employment, and there's nothing to indicate that he,
15 the Governor, and Ms. Jenkins ever had any kind of
16 relationship where he was making unwelcome sexual
17 advances to her. Just not going to allow the
18 question. This isn't a divorce court and, you know,
19 we're not, we're just -- the essence of this is an
20 employment case, and the only opening for
21 nonemployees is unwelcome advances.

22 MR. CAMPBELL: Judge, so the record is
23 clear, you are sustaining the Defendant's objection.

24 JUDGE WRIGHT: I am, I'm sorry. The Court
25 apologizes for the soliloquy, but I am sustaining his

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1 objection. I'm over -- the reason I said I'm
2 overruling, actually I guess I was in advance
3 overruling your objection. I was sustaining Mr.
4 Bennett's objection. And it's, it's very consistent
5 with all this Court's prior, prior rulings.

6 Now, if, if he opens the door some way, if
7 someone, you know, cracks open that door that somehow
8 Ms. Jenkins was seeking employment or was somehow
9 employed, that, that would be enough to ask the
10 question. You can ask the question only then or if
11 somehow it gets out in a good faith basis that Mr.
12 Clinton was making some sort of unwelcome sexual
13 advance to her, especially one with the help of a
14 state trooper. That is so, so close to what happened
15 to Ms. Jones, allegedly, that it would be admissible
16 under Rule 404(b).

17 MR. FISHER: Your Honor, then, may I ask a
18 question?

19 JUDGE WRIGHT: You may.

20 MR. FISHER: If there is not an employment
21 nexus but there is evidence that state troopers
22 actually arranged the meeting and protected the
23 Governor, so as to intercept anyone who might
24 discover them.

25 JUDGE WRIGHT: No, sir, I'll tell you what,

1 that's, you're trying to take the trooper nexus and
2 go beyond what the Court has ruled. The trooper
3 nexus is important when a trooper goes out and picks
4 out a woman in a crowd and says the Governor wants to
5 see you and she's horrified when, when she meets the
6 Governor and he does something similar to what
7 happened to Ms. Jones.

8 MR. BRISTOW: Allegedly.

9 MR. BENNETT: Allegedly.

10 JUDGE WRIGHT: Allegedly, yeah I'm just
11 I'm sorry, I should have said allegedly.

12 MR. BENNETT: That's all right.

13 JUDGE WRIGHT: We are on the record, and
14 I'm speaking extemporaneously without any notes, but
15 the trooper nexus alone in that situation is not
16 going to be enough because the trooper's there all
17 the time, there's almost always, notwithstanding what
18 the Governor just testified to, there's almost always
19 some kind of trooper nexus, particularly when it's at
20 the Governor's Mansion, that's just the way it is,
21 and it's really hard for me to make that line, but
22 I'm not going to let you take other state resources,
23 you know, the abuse of other state resources.

24 We're talking about what happened to Ms.
25 Jones and other similar conduct. Now if you have

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1 some lady who will testify under oath that Mr.
2 Clinton made sexual advances to her when the trooper
3 either went to fetch her or protected her and then
4 she was horrified and didn't want to do this, if she
5 alleges that under oath, that would be, that would be
6 admissible. Even if she's not an employee.

7 MR. FISHER: May I ask the President
8 whether he ever made sexual advances to a woman while
9 he was Governor or President which ~~were~~ totally
10 uninvited?

11 JUDGE WRIGHT: You can ask him if it was
12 unwelcome.

13 MR. FISHER: All right.

14 MR. BENNETT: I have no objection to the
15 question if that's not going to be viewed as any kind
16 of a waiver, but if --

17 JUDGE WRIGHT: It's not a waiver at all.
18 What I've, as I've always said that if, if he --

19 MR. BENNETT: If he wants to ask that
20 question.

21 JUDGE WRIGHT: If he wants to ask that, but
22 I still think if this happened when he was without
23 his trooper guard, and he's on a vacation with, with
24 his family or himself, and he's not acting as
25 Governor in any capacity, you can't, I mean, it has

1 to be qualified in that way. What if he went to
2 Canada on a hunting trip without any troopers.

3 MR. FISHER: We would argue that's --

4 JUDGE WRIGHT: That would be different.
5 That would be protected, I mean from discovery. It's
6 got, you've got to have that, that state actor nexus
7 somehow.

8 MR. BENNETT: Right.

9 JUDGE WRIGHT: And what's unfortunate for
10 this particular Defendant is that he was the head of
11 the state, and that's one reason we have such a -- I
12 say it's unfortunate, it's not unfortunate for him as
13 Governor, it might be unfortunate for him in a sexual
14 harassment case because of all the people who he, the
15 universe of people who were arguably working for
16 him.

17 MR. FISHER: Very well, Your Honor.

18 Q. Mr. Clinton, did it ever happen that you
19 were at a state function and up on the podium and
20 there was a state trooper next to you, and you asked
21 the trooper to go down and talk to a particular woman
22 in the crowd and obtain identifying information such
23 as her name or address or telephone number? Did that
24 ever happen?

25 A. I don't believe so, sir. I have absolutely

1 no memory of that.

2 Q. Did it ever happen that while you were
3 performing your duties as Governor, attending some
4 state function, that you made a completely uninvited
5 sexual advance toward a woman other than your wife?

6 A. I don't believe so, no.

7 Q. Now, in the 1980's when you were Governor,
8 your chief of staff was Ms. Betsey Wright, correct?

9 A. That's correct.

10 Q. She reported directly to you?

11 A. She did.

12 Q. And obviously you spent a great deal of
13 time working with her?

14 A. Yes. She worked very hard. She was there
15 long hours.

16 Q. Now, before the 1988 presidential election,
17 did you consider running for President in that
18 election?

19 A. I did, yes.

20 Q. And --

21 A. Excuse me.

22 Q. -- did you discuss with Betsey Wright that
23 decision, whether to run for President or not?

24 A. Among many other people I did discuss it
25 with her.

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1 Q. Do you recall an occasion when you
2 discussed that issue with Betsey Wright at her home?

3 A. I recall discussing with Betsey Wright.
4 I'm not sure I remember where I discussed it with
5 her, that's ten years ago, but I recall discussing it
6 with Betsey Wright.

7 Q. Do you recall in any of those discussions
8 with Betsey Wright addressing with her what I will
9 call the womanizing issue, for want of a better term?

10 A. Yes. I do.

11 Q. And during that conversation did you make
12 a list of names of women who someone might say had
13 had an extramarital affair with you?

14 MR. BRISTOW: Your Honor, again, unless one
15 of the predicates is shown here, this is very
16 invasive to privacy. It is, it's terrible for the
17 institution of the presidency, and unless there is a
18 nexus shown, these kind of questions like is there
19 any discussion, or have you ever heard any rumor
20 about this or that, I just don't think that is
21 relevant or likely to lead to the discovery of
22 relevant evidence. We have been taking depositions
23 in this case since early October, and I think the way
24 for him to do that is to inquire about specific women
25 with regard to whether there's a predicate, but this

1 question I think is, is very bad.

2 MR. BENNETT: Also, Your Honor, I join in
3 that. This is just an attempt to end run the several
4 rulings you've made in the case, and that's all that
5 is. It's just an attempt at end run.

6 JUDGE WRIGHT: If I recall correctly,
7 there, there has been a ruling in the Betsey Wright
8 motion to quash her deposition that dealt to some
9 extent with this issue, and it's very difficult for
10 me to say that this is not likely to lead to
11 admissible evidence. It would not be admissible of
12 itself. I mean in and of itself this is not
13 admissible. However, I'm going to overrule the
14 objection. I will permit the question, because the
15 Court finds that it's reasonably calculated to lead
16 to admissible evidence. However, it would never -- I
17 mean just a, rumors or a list of females would not be
18 admissible in and of itself, but go ahead, you may
19 ask.

20 MR. FISHER: Thank you, Your Honor.

21 Q. When you were discussing with Betsey Wright
22 the decision whether you should run for President in
23 the 1988 election, did the two of you ever make a
24 list of women's names who might be the subject of
25 some rumor or accusation that they had a sexual

1 relationship with you?

2 A. I don't believe we did make such a list. I
3 discussed this with Betsey, and she said what she had
4 to say, I said what I had to say, but I don't believe
5 there ever was any such list.

6 Q. Okay, and when I say list, I'm referring
7 not only to a written list but also an oral listing.
8 Did you ever verbally or orally run through a list of
9 names.

10 A. In discussing this with her? I don't
11 believe so.

12 Q. All right.

13 A. I don't remember it. I certainly -- I
14 don't remember it. I don't believe I did.

15 Q. Now, after you discussed that issue with
16 her, did she recommend that you not run for
17 President?

18 A. I, I believe she did, but I don't -- I'm
19 embarrassed to tell you this, but I don't remember
20 what her recommendation was. I solicited her opinion
21 and that of many others. I asked everybody to talk
22 about the pluses as well as the minuses. I believe
23 she was one of those who recommended that I not run,
24 but I can't be positive.

25 Q. Over the course of the next four years, up

1 to the time when you decided to run for President in
2 the 1992 election, did you take any action to try to
3 suppress any rumors about any particular women who
4 allegedly had had sexual relationships with you?

5 MR. BENNETT: Now, when you say -- excuse
6 me -- when he said -- objection to the form. When
7 you say "suppress," do you mean him personally? Do
8 you mean him personally?

9 MR. FISHER: I asked whether he took any
10 action.

11 MR. BENNETT: Okay, whether he personally
12 took any action. Okay, thank you.

13 A. Could you, could you ask the question again
14 because --

15 Q. Yes, sir.

16 A. -- I want to give you a completely accurate
17 answer. I want to make sure I understand the
18 question.

19 Q. Between the time when you decided not to
20 run for President in the '88 election and the time
21 when you decided to run for President in the '92
22 election, did you take any action to try to suppress
23 any rumors about women who allegedly had had
24 extramarital affairs with you?

25 A. I believe the accurate answer is that

1 because of what happened in the 1990 Governor's race
2 I took action to try to prevent erroneous rumors from
3 becoming public news.

4 Q. All right, sir. What action did you take?

5 A. Well, if I could begin at the beginning. A
6 man named Larry Nichols worked for the State of
7 Arkansas, and while working there he developed quite
8 a grudge against me because he made six hundred long
9 distance phone calls to various right-wing groups
10 with which he was associated, and when it came out
11 his boss thought the taxpayers shouldn't pay for it
12 and dismissed him. He was not reinstated. He
13 claimed that what he was doing was in the public
14 interest. I won't go through the details.

15 He subsequently directed his anger at me
16 and alleged that I had had affairs with a number of
17 women, so the first action I took that I remember
18 was, he did this on the steps of the Capitol one day
19 in 1980, '90. A few minutes after this press
20 conference he had, I drove up to the Capitol and a
21 reporter confronted me with it. I said to the
22 reporter, this is the first I have ever heard of it,
23 why don't you call the women and ask them if it's
24 true before you run the story. That's the first
25 action I took. I don't know if that qualifies as

1 suppression, but it, back then, you know, if you
2 denied something like that, it didn't get in the
3 press. So that was the first thing that happened.

4 And then, then a lot of that, that was, as
5 far as I know, that's about as far as it went in
6 1990. And then some of those were recycled again in
7 the '92 presidential campaign.

8 Q. During the 1992 campaign, did you give
9 Betsey Wright the responsibility to deal with rumors
10 about alleged extramarital affairs involving you?

11 A. Along with the other charges that were made
12 against me.

13 Q. Okay.

14 A. Which I, some of which I enumerated earlier
15 in my testimony. Someone had to, someone who knew
16 me, at least, had to deal with any charges that came
17 up and had to find the best way to respond to them.

18 THE WITNESS: Actually, Judge, could I have
19 a five-minute break? I'd really like to go to the
20 restroom.

21 JUDGE WRIGHT: Yes, you may. We'll be in
22 recess for five minutes.

23 (Short recess.)

24 (Exhibits 10-13 marked.)

25 JUDGE WRIGHT: All right, Mr. Fisher, you

1 may resume.

2 MR. FISHER: Thank you, Your Honor.

3 Q. Sir, I'm handing you what has been marked
4 as Deposition Exhibit 10. Do you recognize that as a
5 copy of your responses to the Plaintiff's First Set
6 of Interrogatories in this lawsuit?

7 MR. ETTINGER: Mr. Fisher, do you have an
8 extra copy?

9 MR. FISHER: I slid two over there.

10 A. Yes sir. I do. I recognize this. It
11 appears to be that as signed by Mr. Bennett.

12 Q. Would you please just read over the
13 response to interrogatory number one, which is only
14 three lines long, and tell me whether it's still true
15 and correct.

16 A. It is still true and correct.

17 Q. All right, thank you, sir. Now, would you
18 please turn to the last page of Deposition Exhibit
19 10?

20 A. Yes, sir.

21 Q. Is that a copy of a verification which you
22 signed?

23 A. It is.

24 Q. I'd like to direct your attention to the
25 words, four lines down, "to the best of my knowledge

1 and belief." I want to make sure that I understand
2 what you meant by those words. Would the
3 verification mean something different to you if those
4 words were not there?

5 MR. BENNETT: Well, I'm going to object.
6 That's an argumentative question, Your Honor.

7 MR. FISHER: Your Honor --

8 MR. BENNETT: This is an appropriate
9 standard verification.

10 MR. FISHER: It's not, Your Honor, and
11 that's the point. If you look at 28 USC Section 1746
12 there is specific language specified to be used, and
13 to the best of my knowledge and belief it's not
14 there. I'll tell the Court quite candidly that
15 there's case law addressing the sufficiency of that
16 which seems to point in both directions. I just
17 simply want to know what the witness meant when he
18 verified these answers.

19 MR. BENNETT: That's all right, then. If
20 that's the question, Your Honor, I don't --

21 JUDGE WRIGHT: I'm not, I'm not aware of
22 the statute. You may ask, however. Go ahead.

23 MR. BENNETT: Your Honor, just for a
24 moment, you know, they had raised that a long time
25 ago. We had researched it. We're satisfied this is

1 perfectly appropriate. The statute 1746 says
2 substantially the following form, and it gives an
3 example, and this is clearly consistent with that.

4 Q. The question, Mr. President, is if there
5 were a period after the word "correct" in the
6 verification, would that mean something different
7 from what is in fact typed here?

8 MR. BENNETT: I'm going to object.

9 Q. "Correct to the best of my knowledge and
10 belief."

11 MR. BENNETT: I don't know what that means.
12 That's the trouble. He's, he may be answering a
13 question that's not being asked. Can he get to the
14 underlying question? I don't know --

15 JUDGE WRIGHT: Let me, let me inject myself
16 here. He referred to interrogatory, the answer to
17 interrogatory number one, and are you referring only
18 to that interrogatory, or are you referring to the
19 entire document?

20 MR. FISHER: At this point I'm referring
21 only to the verification, Your Honor.

22 JUDGE WRIGHT: All right, are you referring
23 to the verification as it relates to the answer to
24 the first interrogatory, or are you referring to it
25 as it applies to the entire document?

1 MR. FISHER: The entire document.

2 JUDGE WRIGHT: All right, and you're asking
3 whether the President would have said anything
4 different had the verification ended with the word
5 "correct"?

6 MR. FISHER: Well, that would be my next
7 question depending on how he answered this one. This
8 question is simply whether it would mean anything
9 different to him if the words "to the best of my
10 knowledge and belief" were not there.

11 MR. BRISTOW: Your Honor, just as a matter
12 of law, any witness who has to testify under the
13 American standard of law, federal or state, all any
14 witness has to do is testify to the best of my
15 knowledge and belief.

16 JUDGE WRIGHT: That, that is correct, but
17 I'm going to let him answer. This is a question I'm
18 going to permit, and I, I am not questioning the
19 validity of the verification.

20 MR. BENNETT: I understand.

21 MR. FISHER: Your Honor, just so the record
22 is clear, there is an eighth circuit case that says a
23 summary judgment affidavit is invalid and totally
24 ineffective if those words are attached.

25 MR. BENNETT: Well--

1 JUDGE WRIGHT: A summary judgment affidavit
2 would be included of course in the statement of
3 undisputed material facts, and it's not acceptable
4 for the Court to just say well, gee, this is his,
5 this is the best of his knowledge, and so that is in
6 a different context from the answers to
7 interrogatories, in my opinion, in my judicial
8 opinion. But I will let you answer the question.
9 You're winning this one, so go ahead and ask.

10 A. Would my response to interrogatory number
11 one be the same if the last words were true and
12 correct?

13 Q. No, sir. The question is, would the
14 verification have a different meaning to you if there
15 were a period after the word "correct"?

16 A. No, because only, what -- the answer I give
17 in interrogatory one is that I don't remember ever
18 meeting the Plaintiff or being alone with her in a
19 room at the Excelsior on that day or any other time,
20 and no matter what phrases were at the end of that
21 sentence, my answer would be exactly the same.

22 Q. Okay.

23 MR. FISHER: Would you mark that, please.

24 (Exhibit 14 marked.)

25 THE WITNESS: May I ask a question?

1 MR. BENNETT: Ask me, ask me the question,
2 please.

3 JUDGE WRIGHT: Yes, I was going to say,
4 don't, don't go volunteering stuff.

5 THE WITNESS: I'm not going to do that.

6 (Witness confers with counsel.)

7 THE WITNESS: Okay.

8 Q. Sir, would you please examine what has been
9 marked Deposition Exhibit 14.

10 Is this a true and correct copy of the
11 Supplemental Responses to Plaintiff's Second Set of
12 Interrogatories that you verified on or about
13 December 23rd, 1997?

14 A. Yes, sir.

15 Q. The supplemental response to interrogatory
16 number ten was the word "none," correct?

17 A. Yes.

18 Q. And the supplemental response to
19 interrogatory number eleven was the word "none"?

20 A. That's correct.

21 Q. Now, interrogatory ten asked you to name
22 every woman with whom you had sexual relations when
23 you were Governor, and the Court imposed certain
24 limitations on that interrogatory as noted in, on the
25 first page; you understand that, sir?

1 A. I do.

2 Q. Okay. So that the record is clear, Mr.
3 President, I wanted to ask you, what did you
4 understand were the limitations on that question when
5 you answered the interrogatory?

6 MR. BENNETT: I object, Your Honor.

7 A. I just took my lawyer's advice on that.
8 That was a -- I, that was a legal question, and I
9 took legal advice.

10 Q. Well, I would like to know what you
11 understood to be the limitations on the question when
12 you answered it.

13 MR. BENNETT: Your Honor, the document
14 speaks for itself, Your Honor. There's a whole first
15 paragraph or two.

16 MR. FISHER: Your Honor, the paragraph
17 generally refers to modifications in scope and
18 content as directed by the Court's Order and
19 discovery conferences held on these issues.

20 MR. BENNETT: Your Honor, what's unfair
21 about this question is there have been several orders
22 in this Court. We would have gone in and explained
23 to the President what your rulings were. As you
24 know, it is commonplace after interviewing your
25 client for lawyers to prepare drafts. That's what we

1 did in this case, and it's an unfair question to ask
2 the President today. He -- about all your orders and
3 all the discussions.

4 JUDGE WRIGHT: I don't know, I don't even
5 know what the questions were anymore. I remember
6 limiting considerably the scope of the
7 interrogatories.

8 MR. FISHER: That's right.

9 JUDGE WRIGHT: But I don't have my Order
10 before me right now, and I wouldn't even -- I'm not
11 surprised that the witness doesn't know how to answer
12 it, because I really don't know what those questions
13 were either, right now.

14 MR. FISHER: The question was, the
15 question, the question is state the name of every
16 woman that you had sexual relations with when you
17 were Governor or President.

18 JUDGE WRIGHT: And the Court ruled that
19 that was too broad, that he would have to, that you,
20 the Plaintiff, Counsel, would have to narrow that,
21 and I believe we had a time limit on it, we had a, we
22 had a class of people to whom that would be limited.

23 MR. FISHER: The Court ordered him to
24 answer the interrogatory as limited, and as this
25 stands, Your Honor, unless he answers this question,

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1 this cannot be used to impeach him, because there's
2 no way to verify what limitations he applied when he
3 answered it. I think it's a simple question. He
4 ought to be able to answer it.

5 JUDGE WRIGHT: Do you have the Court's
6 Order before you?

7 MR. FISHER: We may have it.

8 JUDGE WRIGHT: You can come back to this
9 question, but I'm going to require that you indicate
10 to the witness what the question was he was answering
11 before you can ask the question. In other words, all
12 we have in your document is just response without the
13 question, as limited pursuant to Court Order, and we
14 don't -- Barry has a bunch of stuff here that -- he
15 doesn't remember the date of the order and I don't
16 either.

17 MR. BENNETT: First of all, Your Honor,
18 something you may not know, is yesterday they filed a
19 motion with the Court dealing with these issues, so I
20 would suggest rather than having that take our time
21 here with the witness, obviously is not going to be
22 able to answer that question, let us file our
23 responses to it, and it's not the kind of thing we
24 can't do by way of interrogatory. We have a limited
25 amount of time here, Your Honor, and --

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1 JUDGE WRIGHT: Mr. Fisher, you may of
2 course impeach the President now, if you have the
3 question, as I have just ruled, or you may impeach
4 the President if and when he testifies at trial, but
5 I'm not going to be able to let you impeach him
6 without that question, without that limitation,
7 because the finder of fact would have no basis for
8 understanding the question.

9 MR. FISHER: My only desire, Your Honor, is
10 to ask him what he thought the limitation was so that
11 his answer has meaning.

12 JUDGE WRIGHT: Well, I don't know that he
13 remembers based on what he just testified, and you
14 may certainly ask him what, if he recalls, but I
15 believe he testified that he answered after
16 consulting with his lawyers, and he's verified it,
17 verified his answer.

18 MR. FISHER: If he says he doesn't
19 remember, I'll move on to something else.

20 MR. BENNETT: Your Honor, I'll withdraw the
21 objection and let it be asked and let him answer. Go
22 ahead and ask him the question.

23 Q. As we noted earlier, the first page refers
24 to limitations on the interrogatories. What did you
25 understand those limitations to be when you answered

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1 interrogatory number ten, "none"?

2 A. I will repeat that I have only a general
3 memory of that. I do not remember the specific
4 conditions that the Judge imposed, that my legal
5 counsel went over them with me and prepared these
6 answers to interrogatories. I do not have a clear
7 and specific memory of what they were.

8 Q. Do you remember any of them?

9 MR. BENNETT: I object, Your Honor. We're
10 trying -- I withdrew the objection so we could save
11 time. I now reinsert it to save time.

12 JUDGE WRIGHT: Well, I overrule the
13 objection. You may ask if he remembers any of it,
14 but this might be a waste of your time, Mr. Fisher.

15 A. I remember generically that there was some
16 sort of a nexus to state or federal employment, and
17 there was some sort of time frame. There may have
18 been other conditions. I can't remember what they
19 were. I just don't remember off the top of my head,
20 anyway.

21 Q. How did you meet Gennifer Flowers for the
22 first time?

23 A. Gennifer Flowers was a, a television
24 reporter for one of the Little Rock stations in the
25 1970's when I became Attorney General.

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1 Q. And how did you meet her for the first
2 time?

3 A. I think she probably covered -- I'm not
4 sure I remember exactly how I met her, but I believe
5 she covered an event where I was doing something as
6 Attorney General.

7 Q. Did you become friends with Gennifer
8 Flowers?

9 A. I later did. There were -- she was part of
10 a group of young people around Little Rock at that
11 time that I was friends with.

12 Q. At what point in time would you say that
13 your relationship had become one of friendship?

14 A. I think it was, excuse me, I wanted -- in
15 1977, I believe that's right. I believe it was
16 1977.

17 Q. And after that did your relationship with
18 her ever change?

19 A. Well, I didn't consider her a friend after
20 she took a hundred fifty thousand dollars to change
21 the story that she had hired a lawyer to protect
22 about whether she had a twelve-year relationship with
23 me.

24 Q. Did you ever pay any money to Gennifer
25 Flowers?

1 A. Absolutely not.

2 Q. Did you ever cause anyone else to pay money
3 to her?

4 A. No, I did not.

5 Q. Did you ever pay off part or all of the
6 debt that she owed?

7 A. I'm unaware that she owed any debt.

8 Q. So you have no recollection of ever paying
9 off any debt?

10 A. No, sir. I did not ever pay off a debt she
11 owed.

12 Q. Did you ever request that someone else pay
13 off a debt that she owed?

14 A. I did not.

15 Q. Is Deposition Exhibit 11 a true and correct
16 copy of a letter that she sent to you?

17 A. It appears to be. I have seen a letter
18 like this.

19 Q. Whose handwriting is that below this, the
20 signature Gennifer?

21 A. I'm not sure.

22 Q. What, if anything, did you do in response
23 to receiving this letter?

24 A. May I ask, when was this letter written?
25 Was there a date on this letter?

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1 Q. I was going to ask you that same question.
2 There was not a date on the copy produced to us.

3 A. I don't know. Let me just say, at some
4 point I remember running into Gennifer Flowers when
5 she moved back to Arkansas. She had been away for
6 several years, and I, I ran into her. I didn't know
7 she was back, and she, at some time thereafter she
8 wrote me a letter asking for help getting a state
9 job. Then -- and I don't think she got one. Then a
10 few years later she wrote me another letter. I know
11 there were two letters. I don't know which one this
12 is. I'm not -- I don't want to mislead you. I just,
13 I don't know which one this is.

14 Q. Let me show you another one that might help
15 you.

16 A. Okay.

17 Q. I'm now handing you, sir, Deposition
18 Exhibit 12. Is this another letter from Gennifer
19 Flowers to you?

20 A. Yes. Now this says, this one has a stamp
21 on it, and a name. The stamp says received February
22 25th, 1991.

23 Q. So this would have been received after she
24 returned to Arkansas from Dallas?

25 A. That's correct. This one did. But I think

1 the other one was written some years before that, as
2 I, as I remember.

3 Q. All right. Let's talk about Exhibit 12,
4 the one that has a date on it.

5 A. And the, the answer to your -- well, you
6 asked me a question about 11, didn't you?

7 MR. BENNETT: Mr. President, let him ask
8 the question.

9 A. Go ahead.

10 Q. What if anything did you do in response to
11 Deposition Exhibit 10?

12 A. Well, there is a note up here in the
13 left-hand corner, though it is not in my handwriting.
14 that says Gaddy on it. Judy Gaddy, and it says Judy
15 has not been very successful in the job hunting area,
16 that's what this letter says. That indicates to me
17 she's already been in touch with her. This letter
18 was just forwarded to her. Judy, Judy Gaddy worked
19 in the Governor's office and that was her job,
20 helping people get jobs.

21 Q. What, if anything, did you do in response
22 to this letter?

23 A. Well, the letter itself, the copy I have,
24 doesn't indicate that I did anything. I have no
25 recollection of doing anything except giving it to

1 Judy Gaddy to see if she could do something to help
2 Gennifer Flowers. She handled many cases like this
3 where people had some difficulties and needed some
4 help.

5 Q. Eventually Gennifer Flowers was hired to
6 work as a state employee for the Arkansas Board of
7 Review Appeals Tribunal, correct?

8 A. That was -- some months after this, that's
9 right. I believe that's right. I think several
10 months after that she did get a state job. Which was
11 a few months after this and a few years after the
12 first letter.

13 Q. At that time Don Barnes was the Chairman of
14 the Board of Review, correct?

15 A. I don't remember that. It certainly may be
16 right. I don't remember who the Chairman of the
17 Board of Review was at that time.

18 Q. Did you ever talk to Don Barnes about
19 Gennifer Flowers?

20 A. I don't remember doing so, sir.

21 Q. Randall Wright was the head of the Appeals
22 Tribunal; do you recall that?

23 A. No, I know him. I didn't remember that he
24 was head of the Appeals Tribunal.

25 Q. Did you ever talk to Randall Wright about

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1 Gennifer Flowers?

2 A. No, sir, I don't believe I did.

3 Q. You mentioned Judy Gaddy because she's
4 mentioned in Deposition Exhibit 12, correct?

5 A. Excuse me. Yes, her name's up there on the
6 left.

7 Q. Okay, and you think she's the person to
8 whom you gave this letter from Gennifer Flowers after
9 you received it.

10 A. I do. You asked me about this handwriting
11 on 11, I think it's probably her handwriting, but I
12 can't be positive.

13 Q. Okay.

14 A. She handled these matters for me, all these
15 kinds of requests.

16 Q. And her husband was name Bill Gaddy,
17 correct?

18 A. That's correct.

19 Q. He also held a state employment position,
20 right?

21 A. Yes, he did.

22 Q. What was his position in 1991?

23 A. I don't know what his position was in
24 1991. He held more than one position when I was
25 Governor. If you think you know, and you tell me,

1 I'll be grateful to know. I don't remember what his
2 position was in 1991, because he had more than one
3 job when I was Governor.

4 Q. Did you ever talk to Bill Gaddy about
5 Gennifer Flowers getting a job?

6 A. I don't believe I did, no, sir.

7 Q. After she received the job, did you ever
8 talk about Gennifer Flowers with anyone who was
9 associated with the Board of Review Appeals
10 Tribunal?

11 A. I do not remember doing so.

12 Q. Are you aware that a State Grievance Review
13 Committee investigated a complaint concerning the
14 hiring of Gennifer Flowers?

15 A. I have, I have a memory that there was
16 some, that there was a complaint filed against her.
17 I don't remember that it was about her hiring. I
18 remember there was a complaint filed against her.

19 Q. Generally, outside of the context of
20 Gennifer Flowers, what was a State Grievance Review
21 Committee?

22 A. I believe it was a committee set up to
23 review the complaints of one state, of a state
24 employee who believed that he or she had been subject
25 to unfair treatment of some kind, and it was sort of

1 the first resort for someone who felt that they had
2 not been miss -- that they had not been treated
3 properly in connection with their work.

4 Q. In the case of Gennifer Flowers, an
5 employee named Charlotte Perry filed a grievance with
6 the Grievance Review Committee; is that right?

7 A. I don't have a specific memory of it.
8 She -- there was a grievance. I remember, I have a
9 general memory that there was a grievance.

10 Q. Do you recall that the committee found that
11 the procedure used to hire Gennifer Flowers was,
12 quote, "improper," close quote?

13 MR. BENNETT: I'm sorry, was proper or
14 improper?

15 MR. FISHER: Improper.

16 A. No, I don't recall that.

17 Q. Do you recall that the Grievance Review
18 Committee found that Ms. Perry had been, quote,
19 "unjustly," close quote, eliminated for
20 consideration for the job that was awarded to
21 Gennifer Flowers?

22 A. No, I don't remember that.

23 Q. After the state grievance review committee
24 made its findings with regard to the procedure under
25 which Gennifer Flowers was hired, did you do anything

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1 in response to that finding?

2 A. I don't believe so.

3 Q. Do you remember talking to anyone about the
4 finding?

5 A. I don't remember doing so. I don't -- no,
6 sir, I don't remember. I can't deny that I did, I
7 just -- I have no memory of that at all.

8 Q. Did you take any action to try to reverse
9 the decision of the Grievance Review Committee?

10 A. Not that I remember. Did she have other
11 options? I don't remember what she did. I don't
12 remember what the facts were. I have no recollection
13 of it at all.

14 Q. Did you ever travel outside of Little Rock,
15 Arkansas with Gennifer Flowers?

16 A. Not that I recall.

17 Q. Do you recall going to Los Angeles,
18 California with her?

19 A. No, sir. When was this? I don't recall.

20 MR. BENNETT: Don't assume that it
21 happened.

22 A. I don't believe I ever took a trip outside
23 of Arkansas with Gennifer Flowers.

24 Q. Did you ever talk to Dolly Kyle, whose name
25 is now Dolly Kyle Browning, about Gennifer Flowers?

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1 A. Yes, I did.

2 Q. Did you tell Dolly Kyle that you had a
3 sexual relationship with Gennifer Flowers?

4 A. No, quite the reverse. I told her that I
5 did not have one. I told her that -- specifically
6 what I said to Dolly Kyle, and I have, I took notes
7 on that, was that her story was not true, the story
8 she had told was not true.

9 Q. And when did that conversation with Dolly
10 Kyle take place?

11 A. It took place at my high school reunion
12 which was sometime in the summer of 1994 or the late
13 spring of 1994.

14 Q. I'm handing you what's been marked
15 Deposition Exhibit 13. Is this Exhibit a copy of
16 notes that you made of something that happened at
17 that high school reunion?

18 A. It is.

19 Q. Toward the bottom of the second page, it
20 looks like the handwriting changes. Is that the
21 handwriting of Marsha Scott?

22 A. It is.

23 Q. And then after the first three pages,
24 there's a typed transcription of notes; is that
25 right?

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1 A. Yes, yes.

2 Q. Have you ever checked the transcription to
3 see if it's correct?

4 A. I read it over rather quickly. I think it
5 is generally correct. I mean, if you have a specific
6 question I'll double-check it before I answer the
7 question. I think it is generally correct.

8 Q. How much time elapsed between the time of
9 the reunion and the time when you made the notes?

10 A. Oh, a few days. I did it as soon as I got
11 back to Washington, shortly after I got back to
12 Washington. I was in Arkansas that night, that day
13 obviously, and then the next day, and then part of
14 another day, and so it was a few days later that I
15 did that.

16 Q. Did you ask Marshā Scott to make some notes
17 as well?

18 A. No. I asked her, I said, I said, I asked
19 her to listen to the conversation when it started,
20 and she stood very close so she could hear
21 everything, and then as soon as the conversation was
22 over, I asked her if she had heard it, and I thanked
23 her, and then I made these notes and I asked her if,
24 if they were consistent with her memory, and she said
25 yes, except I think that the, the conversation went

1 on a little longer than you said, which I think is
2 reflected in her comment. And so that's how this
3 happened.

4 Q. Were the original notes made by Marsha
5 Scott on the same page as your notes as is indicated
6 by the second page of this exhibit?

7 A. I, I believe so, sir. I believe that's
8 right.

9 Q. So you wrote your notes first and then she
10 made hers?

11 A. That's correct. I asked her to read it and
12 see if that was an accurate and complete account of
13 the conversation, and she said she thought it was a
14 very good account of the conversation, except she
15 felt that it had gone on a little longer than my
16 notes indicated, and so she indicated that in her
17 comments.

18 Q. What was significant about this event that
19 made you want to write these notes about it when you
20 got back to Washington?

21 A. Well, I think she was -- first of all, she
22 was very upset. Secondly, she was mad at me for not
23 calling her back in 1992 when she was the subject of
24 a potential tabloid story, and she thought it
25 manifested a lack of trust in her. Thirdly, she was

1 mad about the Gennifer Flowers story, and I told her
2 it wasn't true, and she said other people thought it
3 was true, and Gennifer Flowers got a hundred fifty
4 thousand dollars, and she needed money too, now.

5 And then she told me about this book she
6 was going to write, said if anybody ever asked her,
7 she would say it was a fantasy, and I pointed out on
8 two or three occasions how we had been friends since
9 she was a young girl, and how I'd always tried to be
10 her friend, and she basically said she didn't want me
11 to be her friend and she was mad at me because I'd
12 never been her lover, especially since she thought I
13 was now Gennifer Flowers' lover, and when I told her
14 Gennifer Flowers' story was bogus and that many, many
15 problems with it had already been proven -- it's very
16 hard to prove your innocence in a case like this, but
17 that we'd done it -- you know, she just was very
18 angry. That's basically what these notes reflect.
19 And I go through, I litanize here what we said and
20 how I tried to be a friend to her.

21 Q: Did she threaten to take some action such
22 that you thought you would need these notes to
23 protect you?

24 A. No, she didn't threaten to take any action
25 but I knew she'd been through a really tough time,

1 and, and she said that she was virtually desperate
2 for money, her marriage had dissolved under very
3 difficult circumstances, and she had been a title
4 lawyer making quite a bit of money in Texas when the
5 real estate market collapsed, and there was a lot of
6 lawyers lost their jobs that were doing that kind of
7 work, and I just thought for my protection when I saw
8 the kind of look she had in her eyes and the way she
9 was behaving I should ask Marsha to listen to it and
10 then we should make notes after it was over. I
11 wasn't paranoid like this until things like this
12 occurred.

13 Q. Where were these notes kept?

14 A. I kept them in a, in a briefcase that was
15 always either under my desk in the White House or in
16 my little private office. That's where they were.

17 Q. Were they in a file folder?

18 A. They were. Nothing else, and they were in
19 a file folder.

20 Q. With anything else?

21 A. No, nothing else was in there.

22 MR. BENNETT: Your Honor, may I ask how
23 much longer Counsel plans to be? We had indicated a
24 four o'clock meeting. I mean, there's a little bit
25 of flexibility there.

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1 JUDGE WRIGHT: You may certainly ask. I'm
2 not, you know, I'm not making any rulings or saying
3 anything until you-all ask, you know, so --

4 MR. BENNETT: I'm not asking you to,
5 Judge. Do you have any sense --

6 MR. FISHER: Your Honor, it might be good
7 if you would give me a couple of minutes, and we can
8 probably make some decisions to cut out a portion of
9 this.

10 MR. BENNETT: Well, could we take a break
11 then, Your Honor, for five minutes?

12 JUDGE WRIGHT: Would a break be helpful to
13 you?

14 MR. FISHER: I think it would.

15 JUDGE WRIGHT: All right, we'll take
16 another five minute break. That will be fine. We're
17 in recess for five minutes.

18 (Short recess.)

19 JUDGE WRIGHT: Have you been able to make
20 some decisions, Mr. Fisher?

21 MR. FISHER: Yes, Your Honor, we can be
22 done in ten minutes.

23 JUDGE WRIGHT: You want to await Mr.
24 Ettinger's return?

25 MR. BENNETT: I think we can proceed, Your

1 Honor.

2 JUDGE WRIGHT: All right, let's proceed.

3 MR. FISHER: We're back on the record?

4 JUDGE WRIGHT: Yes, sir.

5 Q. Did you ever have sexual relations with
6 Gennifer Flowers?

7 MR. BRISTOW: Your Honor, I want to object
8 to that on the basis that there has not been a proper
9 predicate laid in that regard. The questioning up to
10 this point in time indicates that the only mention of
11 state employment came as testified to by the
12 deponent. Your Honor has probably had access to the
13 testimony of Gennifer Flowers, who, putting it like
14 this, her allegations, even if believed, indicates
15 that nothing in the nature of a sexual relationship
16 was occurring or occurred after the time that she
17 received any state employment, so the nexus that Your
18 Honor has been requiring, or the predicate, is just
19 simply not there, and they've had an ample
20 opportunity to, you know, to develop that nexus or
21 that predicate today, but they have not done so, and
22 putting it like this, asking whether or not something
23 occurred back in the early seventies or early
24 eighties when the state employment is, we're talking
25 about 1991, and Your Honor has previously made a

1 ruling about the scope, '86 forward, it's just one of
2 those areas that they should not be allowed to
3 pursue.

4 JUDGE WRIGHT: All right, and I'm sure Mr.
5 Bennett agrees with you; is that correct, Mr.
6 Bennett?

7 MR. BENNETT: I'll join in, Your Honor.

8 JUDGE WRIGHT: All right. The objection is
9 overruled. The Plaintiff's Counsel may ask
10 consistent with the Court's prior rulings. Go
11 ahead.

12 MR. BENNETT: You may answer the question.

13 A. The answer to your question, if sexual
14 relations are defined as --

15 MR. BENNETT: No, Mr. President.

16 THE WITNESS: What?

17 MR. BENNETT: Go ahead.

18 A. That's right, that was upheld by the
19 Court. The answer to your question, if the
20 definition is section one there in the first piece of
21 paper you gave me, is yes.

22 Q. On how many occasions?

23 A. Once.

24 Q. In what year?

25 A. 1977.

1 Q. Did you ever make sexual advances to
2 Gennifer Flowers after that occasion which did not
3 culminate in sexual relations?

4 A. No.

5 Q. Did she make sexual advances to you which
6 did not culminate in sexual relations?

7 A. Yes. Once.

8 Q. When was that?

9 A. I don't remember. Sometimes after she came
10 back, she invited me to come and see her.

11 Q. Did you ever visit her at her apartment?

12 A. I don't believe so. Let me say, I saw her
13 in the Quapaw Tower. I've said this before, and let
14 me explain how this happened that I saw her. I never
15 knew she was back in Arkansas. Contrary to her
16 protestations, I never saw her in Texas, I never knew
17 what she was doing there, I never had any contact
18 with her except once in a while she'd come back to
19 Arkansas and call and say hello and how are you.

20 I was going into the Quapaw Tower one night
21 to see, I had three very, very close friends, three
22 of my closest friends lived there, and I ran into
23 Gennifer Flowers, and she told me she was back in
24 town and that she was singing, and her mother was
25 ill, and she wanted to be near her mother in southern

1 Missouri, and I, I believe this was in the lobby of
2 the Quapaw Tower, but it could have been on the floor
3 where her apartment was, and if so, I could have
4 stuck my head in there for a minute or two, but I
5 don't believe so. I'm pretty sure it was in the
6 lobby.

7 Q. Is it your testimony then that that's the
8 only occasion on which you ever saw Gennifer Flowers
9 at the Quapaw Apartments?

10 A. Yes. Now I believe that I might have heard
11 her sing once during the years she was in Arkansas,
12 and I don't remember whether she was singing there at
13 the place in the Quapaw Tower, or whether I heard her
14 sing somewhere else. I just had this vague memory
15 that I also heard her sing once, and it might have
16 been there.

17 Q. But in an apartment --

18 A. That's correct.

19 Q. -- or in the hallway leading to the
20 apartment --

21 A. That is my testimony.

22 Q. -- there was only one time you saw her?

23 A. That's correct.

24 Q. Move up in time to when you learned that
25 some of the state troopers who had been on your

1 Security Detail were making public statements and
2 talking to reporters. Did you ask Betsey Wright to
3 go talk to Danny Ferguson?

4 A. After Danny Ferguson reached out to me, I
5 might have done that. I can't remember, because
6 Betsey Wright knew the most about all these issues,
7 so I might well have done that. I don't remember
8 exactly what I asked her to do, but I might, I might
9 well have contacted her and asked for her advice on
10 this since she had dealt with it in the campaign.

11 Q. Did you talk to her about having Danny
12 Ferguson appear in a news conference?

13 A. Perhaps I did. I don't recall.

14 Q. Did she --

15 A. There's some reference to that in the notes
16 that I, that you and I went over a few moments ago.

17 Q. Did she ever report back to you that she
18 had asked Danny Ferguson to appear in a news
19 conference?

20 A. I don't remember. I discussed that
21 directly with Danny Ferguson. I mean I discussed
22 his, possibility of his making a public statement
23 directly.

24 Q. And did he agree to do so?

25 A. No.

1 Q. Did he say why he would not do so?

2 A. Yes. He said, he said, "I feel threatened,
3 they say they will get me if I say anything about
4 this, and I'm just going to try to do what Ronnie
5 Anderson says and keep my mouth shut."

6 From that I infer that he had gone along in
7 hopes of getting the money and then thought better of
8 it and didn't want to be embarrassed for the
9 contradictory statement.

10 Q. While you were Governor was there ever a
11 time when you would leave the Governor's Mansion by
12 yourself in a car or truck owned by one of the state
13 troopers?

14 A. I don't believe I ever did that.

15 Q. Do you recall a time when the security
16 guards there at the Governor's Mansion changed their
17 procedure for keeping logs of who had come to the
18 Governor's Mansion?

19 A. No.

20 Q. That was very awkwardly worded, I
21 apologize. For a time there was a log made of every
22 person who came to the Governor's Mansion while you
23 were Governor, right?

24 A. I, I don't know.

25 Q. Okay. Do you recall any discussion about

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1 changing the procedure for keeping track of who came
2 to the Governor's Mansion?

3 A. I don't remember. I don't remember how
4 they kept records, who kept them, who, where they
5 were -- what the repository was.

6 Q. Do you recall any discussion of the, of a
7 change in the practice of keeping all of the old
8 phone logs that would reflect all the calls made to
9 the Governor's Mansion?

10 A. No, I don't. Now, could you ask that
11 question again?

12 Q. Do you recall any discussions, sir, about
13 changing the procedure with regard to keeping phone
14 logs of phone calls made to the Governor's Mansion?

15 A. Phone calls made to the Governor's
16 Mansion. No, sir, I don't, I don't recall that.

17 Q. Do you recall traveling to Denver,
18 Colorado, with L.D. Brown and staying in the Brown
19 Palace Hotel?

20 A. When was that?

21 Q. I don't know. When you were Governor.

22 A. I have no idea if L.D. Brown was there. I
23 went to the Brown Palace in 1980 to the Governor's
24 Conference. The Governor's Conference was held in
25 Denver in 1980, and I remember being in the Brown

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1 Palace. I'm sorry, I don't remember if I actually
2 stayed there, if that's where we stayed. I remember
3 being there.

4 Q. Do you recall a trip to Portland, Maine,
5 with L.D. Brown?

6 A. I have no idea if L.D. Brown was there. I
7 was in Portland, Maine, at the Governor's Conference
8 in 1993 with my family, 19 -- excuse me, 1983.
9 1983.

10 Q. All right. There was a state trooper with
11 you, you just don't remember if it was L.D. Brown?

12 A. There probably were two. Normally,
13 normally I think two of them went when I went to the
14 Governor's Conference because there was more work to
15 do.

16 Q. Let's go back to the trip to Denver. Do
17 you recall during that trip ever asking a state
18 trooper to get the name and phone number of a woman
19 that you had seen?

20 A. Absolutely not.

21 Q. And same question for the trip to Portland,
22 Maine, did you ever ask a trooper to get the name and
23 phone number of a woman that you saw?

24 A. Absolutely I did not. Are you asking me
25 about L.D. Brown?

1 A. Any trooper that accompanied you on that
2 trip to Portland, Maine.

3 Q. Well, I did not do that, but L.D. Brown did
4 a lot of things, it was well known, for himself, that
5 he tried to lay off on to other people, and I think
6 his reputation is legendary enough that if you talk
7 to enough other people involved in security they will
8 tell you the same thing.

9 Q. Do you know a woman named Cathy Ford?

10 A. Cathy Ford? There's a woman named Cathy
11 Ford who used to work for me.

12 Q. Did you ever ask her to talk to L.D. Brown
13 about keeping quiet concerning anything?

14 A. Not, not that I remember. I might have
15 asked somebody to ask L.D. Brown not to lie, but that
16 would be a fruitless request.

17 Q. Did you ever have a conversation with Dolly
18 Kyle in which she told you that she had come to the
19 conclusion that she had a sexual addiction?

20 A. I do not believe so.

21 (Off-the-record discussion.)

22 MR. FISHER: At this time, Your Honor, we
23 have no further questions.

24 JUDGE WRIGHT: Very well. Mr. Bristow?

25 MR. BENNETT: Could I see Mr. Bristow?

1 Could we just take a minute, please?

2 JUDGE WRIGHT: You may.

3 MR. BRISTOW: Can we go off the record,
4 Your Honor?

5 JUDGE WRIGHT: You can go off the record.
6 We'll take a brief recess. I think they're probably
7 trying to cut the time.

8 (Short recess.)

9 CROSS-EXAMINATION

10 BY MR. BRISTOW:

11 Q. Mr. President, I am Bill Bristow, and I
12 represent Danny Ferguson. I have a very brief number
13 of questions for you. As you know, the Plaintiff in
14 this case has alleged that Danny Ferguson and
15 yourself entered into some form of an agreement or a
16 conspiracy to violate the rights of Paula Corbin
17 Jones, and I want to ask you to tell me, and the jury
18 may get to hear this testimony, I want you to tell us
19 in terms, very clear terms, whether you and Mr.
20 Ferguson ever had some sort of an agreement or a
21 conspiracy with regard to violating the rights of
22 Paula, Paula Corbin Jones.

23 A. No, sir, we did not.

24 Q. You have, you have indicated that you don't
25 have any recollection of meeting Mrs. Jones on this

1 particular day, but if you and Mr. Ferguson had
2 arrived at some sort of conversation, some sort of an
3 agreement, some sort of a conspiracy, that would be
4 something you would remember, would it not, Mr.
5 President?

6 A. Well, of course, but I didn't do that.

7 Q. And the point is, are you able to
8 categorically say that there was never any sort of
9 agreement, never any sort of conspiracy between
10 yourself and Mr. Ferguson with regard to his bringing
11 Paula Jones to meet you or anything like that?

12 A. Yes.

13 Q. All right. Now, Mr. President, when you
14 were Governor of Arkansas, or even as Attorney
15 General, before you ran for President, from time to
16 time when you would be at official functions, did you
17 not find that people wanted to meet you and to be
18 able to be in your presence just, just to meet you?
19 Did you not find that to be common?

20 A. Yes, sir, it was quite common.

21 Q. And as someone who was in the political
22 arena, actually the fact that people had feelings
23 about you where they would express the right or
24 express the desire to meet you as a person who was
25 holding elective office, was that something you would

1 consider a good thing, that people would want to, to
2 meet you?

3 A. Yes, sir, I did.

4 Q. And insofar as those requests would be
5 made, if you were in a position to allow someone to
6 talk to you to fulfill that request to meet you, did
7 you try to do that from time to time?

8 A. I did it many times.

9 Q. And not even talking about the number of
10 people that you would have met since you began
11 running for President, but in your time as Governor
12 of Arkansas up through May of 1991, would you imagine
13 that there were literally hundreds and thousands of
14 people that you met from time to time who they may
15 remember a meeting with you, but you were, as the
16 Governor, were just simply being nice and talking to
17 people that had expressed a desire to meet you?

18 A. I would think there were several people who
19 would, many people who would remember that they met
20 me, shook my hand, talked to me for a few minutes,
21 that I might not remember, yes.

22 Q. And a member of your Security Detail, a
23 state trooper such as Mr. Ferguson, if a constituent
24 of the State of Arkansas, if a, a taxpayer, a voter
25 of the State of Arkansas expressed a desire to meet

1 you, to make your acquaintance, would you not want
2 Mr. Ferguson to bring that to your attention, or any
3 other member of your Security Detail, if a
4 prospective voter or a taxpayer had made such a
5 request?

6 A. Yes, or a child, or anybody from the state,
7 of course I would.

8 MR. BRISTOW: Mr. President, that's all the
9 questions I have, thank you.

10 CROSS-EXAMINATION

11 BY MR. BENNETT:

12 Q. Mr. President, all right, you recall
13 earlier today that Mr. Fisher asked you several
14 questions about Miss Lewinsky?

15 A. Yes, sir, I do.

16 Q. And do you recall there was a discussion
17 about an affidavit of Miss Lewinsky, generally?

18 A. Yes, sir, I remember that.

19 Q. I'm going to read you certain portions of
20 Miss Lewinsky's affidavit, and ask you about them.

21 In paragraph six of her affidavit, Miss
22 Lewinsky, also known as Jane Doe Number 6, says as
23 follows: "In the course of my employment at the
24 White House I met President Clinton several times. I
25 also saw the President at a number of social

1 functions held at the White House. When I worked as
2 an intern, he appeared at occasional functions
3 attended by me and several other interns. The
4 correspondence I drafted while I worked at the Office
5 of Legislative Affairs was seen and edited by
6 supervisors who either had the President's signature
7 affixed by mechanism or, I believe, had the President
8 sign the correspondence itself."

9 Is that an accurate and true statement, to
10 the best of your knowledge?

11 A. It's an accurate and true statement about
12 how the correspondence is handled in the
13 Congressional Affairs Division. I can't -- I know of
14 no reason why the rest of it's not accurate.

15 MR. FISHER: Your Honor, excuse me --

16 A. I don't know directly whether it's all
17 accurate.

18 MR. FISHER: Just wanted to make clear,
19 Your Honor, that since this is a discovery
20 deposition, that hearsay objections are reserved and
21 need not be made.

22 MR. BENNETT: I agree with that.

23 JUDGE WRIGHT: Absolutely, and that's the
24 reason I was trying to say when I came back from
25 lunch that even though I'm permitting Mr. Bennett to

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1 do this, if this is ever used at trial, the Rules of
2 Evidence would apply, and as stated before, the Rules
3 of Evidence don't apply in this discovery
4 deposition. Go ahead.

5 Q. In paragraph eight of her affidavit, she
6 says this, "I have never had a sexual relationship
7 with the President, he did not propose that we have a
8 sexual relationship, he did not offer me employment
9 or other benefits in exchange for a sexual
10 relationship, he did not deny me employment or other
11 benefits for rejecting a sexual relationship."

12 Is that a true and accurate statement as
13 far as you know it?

14 A. That is absolutely true.

15 Q. Do you recall, do you recall --

16 MR. BENNETT: Your Honor, may I have this
17 appended as an exhibit to this deposition, please?

18 MR. FISHER: No objection, Your Honor.

19 JUDGE WRIGHT: All right, it may be.

20 MR. BENNETT: All right.

21 Q. Now you're aware, are you not, of the
22 allegations against you by Paula Corbin Jones in this
23 lawsuit; is that correct?

24 A. Yes, sir, I am.

25 Q. Mr. President, did you ever make any sexual

1 advances towards Paula Jones?

2 A. No, I did not.

3 Q. Did you ever expose yourself to Paula
4 Jones?

5 A. No, I did not.

6 Q. Did you ever ask Paula Jones to kiss your
7 penis?

8 A. No, I did not.

9 Q. Now, Mr. President, you've stated earlier
10 in your testimony that you do not recall with any
11 specificity the May 8th, 1991 conference at the
12 Excelsior; is that correct?

13 A. That's correct.

14 Q. If that is true, sir, how can you be sure
15 that you did not do these things which are alleged in
16 Ms. Jones' complaint?

17 A. Because, Mr. Bennett, in my lifetime I've
18 never sexually harassed a woman, and I've never done
19 what she accused me of doing. I didn't do it then,
20 because I never have, and I wouldn't.

21 Q. Mr. President, do you recall during your
22 direct examination Mr. Fisher asked you questions
23 about Beth Coulson?

24 A. Yes, I do.

25 Q. And you recall he asked you about being in

1 a Jaguar car with her?

2 A. Yes, sir, I do.

3 Q. Mr. President, I'm going to read to you
4 portions of Ms. Coulson's affidavit on January 2nd,
5 I'm sorry, deposition, on January 2nd, 1998.

6 Question by Mr. Fisher, You have, "You have
7 been in an automobile with Mr. Clinton, of course, as
8 you've testified."

9 And she says, "Yes."

10 Question, "Have you ever engaged in any
11 sexual activity with Mr. Clinton while he was
12 Governor of the State of Arkansas?"

13 Answer, "Didn't you just ask me that?"

14 Question, "No, the earlier questions were
15 limited to a certain location."

16 Answer, "Oh, well, no."

17 Question, "And so there's absolutely no
18 question about it when I say, quote, "sexual
19 activity," close quote, I mean you touching his
20 genitalia with any part of your body or him touching
21 your genitalia with any part of his body; is that
22 clear?"

23 Answer, "That's clear."

24 Question, "And was that definition
25 consistent with the one you used when you answered

William Jefferson Clinton

1 the earlier questions today?"

2 Answer, "Yes, I know what sexual activity
3 is."

4 Did you ever have sex with Beth Coulson?

5 A. I believe I answered that earlier. No.

6 Q. Are her statements here in this deposition
7 true and accurate?

8 A. They are true.

9 Q. And on any of these -- this is a further
10 question.

11 "And on any of these occasions did you
12 engage in any sexual activity with him?"

13 Answer, "No."

14 Question, "At the Governor's Mansion were
15 you ever with Mr. Clinton in a room with no one else
16 present?"

17 Answer, "Yes."

18 Question, "On any of those occasions, did
19 you ever engage in any sort of sexual activity with
20 him?"

21 Answer, "No."

22 Were those true and accurate statements by
23 Ms. Coulson?

24 A. Yes.

25 Q. My final question, Mr. President, or final

1 few questions, is why didn't you run, I guess, what
2 was it, in 1988 after talking to Betsey Wright? Was
3 it '88?

4 A. (Witness nods head.)

5 Q. Why didn't you run? What were the reasons
6 you didn't run?

7 A. Well, there were several reasons. First of
8 all, I thought I was -- I thought it was a good
9 opportunity, but I thought I -- and I thought I was
10 ready politically for the campaign, including the
11 attacks, but I wasn't sure I was mature enough to be
12 President. I think it's a difficult job with a lot
13 of pressure, and particularly nowadays you have to be
14 willing to deal with an enormous amount of
15 distraction from people who have interests other than
16 just seeing you do your job.

17 The other thing was my little girl was very
18 young.

19 Q. How old was she?

20 A. She was about seven in 1987, and I could
21 tell that she was really afraid of it, and Hillary
22 and I talked about it, and we knew that in all
23 probability she'd be the only child we ever had, and
24 I just didn't, I just didn't think she was ready for
25 it either.

1 Q. Now, did anyone advise you not to run in
2 1992?

3 A. '91, you mean? Oh, sure.

4 Q. '91.

5 A. Matter of fact I was told in no uncertain
6 terms that the administration had cased the field and
7 that none of the others could win, that I might have
8 a chance to win, that the press had to have somebody
9 every election and I was going to be offered up, and
10 that they were so gullible about little states they'd
11 believe anything they were told about Arkansas, and
12 that if I ran I would be destroyed. That's what I
13 was told. And for six years they've worked very hard
14 at doing it. But I'm very glad I did it anyway.

15 MR. BENNETT: All right, Your Honor, I
16 don't have any, any more questions, and that's it,
17 and the President is running late for that --

18 MR. FISHER: I have just a couple follow-up
19 questions for him.

20 MR. BENNETT: Yeah, That's fine.

21 REDIRECT EXAMINATION

22 BY MR. FISHER:

23 Q. When you were talking to Betsey Wright
24 about whether to run in the 1988 election, you
25 discussed with her what had happened to Gary Hart,

1 didn't you?

2 A. I did.

3 Q. And how he had invited journalists to
4 follow him around and satisfy themselves that he was
5 not engaged in what he was rumored to have done, and
6 that he had been caught with Donna Rice on a yacht
7 called the Monkey Business; did you discuss that with
8 Betsey Wright?

9 A. I discussed Gary Hart with a number of
10 people when it happened and, and later.

11 Q. And did that development have any bearing
12 on your decision?

13 A. I think anybody who runs for office today
14 understands that if you, the better you do, the more
15 scrutiny you're going to get, and you have to be more
16 sensitive today because there's all that money out
17 there being paid to people to say things that will be
18 destructive of you, people being offered fame and,
19 and life support systems and help with their
20 expenses, and the standards of the press and proof
21 and truth are so much lower than they used to be,
22 that it is of concern to anyone, and yes, I
23 considered it, and then I decided that I thought our,
24 the country needed to change direction and I was
25 willing to undergo the pain and that I didn't like

1 being threatened, and so I thought I'd stand up to it
2 and see if I couldn't survive it.

3 Q. But in 1988, after talking about the
4 situation, including the Gary Hart experience, with
5 Betsey Wright, you decided not to run?

6 A. I talked to Betsey Wright and I talked to
7 lots of other people. Ironically, my wife, who
8 turned out to be right about this, thought that the
9 conventional wisdom was that '88 would be a good year
10 to run for a Democrat and '92 would be a terrible
11 year to run. Her judgment was that the Reagan
12 revolution had not played itself out, that the
13 economy was in good shape, that '88 was a bad year to
14 run, and that '92 would be a good year to run, and
15 she felt that way even when President Bush's approval
16 rating was way above seventy percent, and I listened
17 to that, but I knew that whenever I decided to run
18 for office that the, the standards of coverage were
19 from my point of view deteriorating over time, so it
20 wasn't like it was going to get a lot better, and
21 especially after what I'd been through in the '90
22 campaign, which was minor, frankly, the main reason I
23 didn't run in 1988 was because I didn't think it was
24 good for my little girl, and when I ran in 1992 I
25 thought she'd be just fine, and it turned out to be

1 just that way.

2 MR. FISHER: For the record, I object as
3 nonresponsive. Your Honor, the only two more
4 questions I have.

5 JUDGE WRIGHT: All right, that's overruled
6 because you've -- anyway, I would permit it, go
7 ahead.

8 MR. FISHER: The only other two questions I
9 have are the two that you've ordered; I cannot ask
10 him. I just want to state them on the record so the
11 record is clear.

12 JUDGE WRIGHT: All right.

13 MR. FISHER: But we can dismiss the
14 President, if you wish.

15 JUDGE WRIGHT: All right. Before he
16 leaves, I want to remind him, as the witness in this
17 matter, and everyone else in the room, that this case
18 is subject to a Protective Order regarding all
19 discovery, that it's my intent that this deposition
20 not be used for any purposes other than the purposes
21 envisioned by the Rules of Civil Procedure and the
22 Rules of Evidence, and that is for use in this Court
23 case and for no other purpose, and therefore, all
24 parties present, including Secret Service agents,
25 videographers, court reporters and the witness are

1 not to say anything whatsoever about the questions
2 they were asked, the substance of the deposition, the
3 length of it, objections, recess, any details,
4 whether the President did well or did not do well,
5 whether he is credible or not credible, whether he
6 admitted or denied any specific allegations, and this
7 is extremely important to this Court that the, this
8 process not be used for any purpose other than the
9 purposes envisioned in the Rules of Evidence and the
10 Rules of Civil Procedure, and that's all I'm going to
11 say.

12 I gave a similar admonition about a
13 year-and-a-half ago when I was up here in the White
14 House, and it worked that time, and I hope that it
15 works this time as well. If it does not, of course,
16 anyone who violates that can be subject to sanctions
17 of the Court.

18 MR. BENNETT: Thank you.

19 JUDGE WRIGHT: And I will excuse the
20 President, I know he has important business to attend
21 to and he's late, and I will, and I will, but we're
22 going to stay on the record just so that Mr. Fisher
23 can make his record, because I'm not letting him ask
24 certain questions.

25 MR. FISHER: Your Honor, there are two

1 questions I'd like to ask, and then depending on
2 the answers to those, there would be obvious
3 follow-up questions, but the two questions are:

4 Number one, Please name every person with
5 whom you had sexual relations when you were either
6 Governor of the State of Arkansas or President of the
7 United States;

8 Number two, Please name every person with
9 whom you sought to have sexual relations when you
10 were Governor of the State of Arkansas or President
11 of the United States.

12 If any names are given in response to
13 either/or both of those questions, then obviously
14 there would be follow-up questions to determine
15 whether there are factors that make those incidents
16 relevant.

17 MR. BENNETT: Your Honor, I, for the
18 record, object, and I would like in the interest of
19 time incorporate by reference the objections here
20 today and all the objections we've made throughout
21 this proceeding.

22 JUDGE WRIGHT: All right. My ruling, my
23 ruling on all those objections for both, from both
24 sides remains the same.

25 MR. BENNETT: Thank you, Your Honor.

1 JUDGE WRIGHT: All right, thank you.

2 (Exhibit 15 marked.)

3 (End of proceedings.)

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CORRECTIONS AND SIGNATURE

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I, WILLIAM JEFFERSON CLINTON, have read the foregoing deposition and hereby affix my signature that same is true and correct, except as noted herein.

WILLIAM JEFFERSON CLINTON

STATE OF TEXAS)

Subscribed and sworn to before me by the said witness, WILLIAM JEFFERSON CLINTON, on this the _____ day of _____, A.D., 1998.

NOTARY PUBLIC IN AND
FOR THE STATE OF TEXAS

My Commission Expires:

William Jefferson Clinton

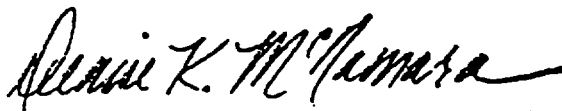
1 STATE OF TEXAS)

2 I, Denise K. McNamara, Certified Shorthand
3 Reporter in and for the State of Texas, do hereby
4 certify that, pursuant to the agreement hereinbefore
5 set forth, there came before me on the 17th day of
6 January, A.D., 1998, at the offices of Skadden, Arps,
7 Slate, Meagher & Flom, L.L.P., in the City of
8 Washington, District of Columbia, the following named
9 person, to-wit: WILLIAM JEFFERSON CLINTON, who was
10 duly sworn to testify the truth and nothing but the
11 truth of his knowledge touching and concerning the
12 matters in controversy in this cause; and that he was
13 thereupon carefully examined upon his oath and his
14 examination reduced to writing under my supervision;
15 that the deposition is a true record of the testimony
16 given by the witness, same to be sworn to and
17 subscribed by said witness before any Notary Public,
18 pursuant to the Federal Rules of Civil Procedure.

19 I further certify that I am neither attorney or
20 counsel for nor related to or employed by any of the
21 parties to the action in which this deposition is
22 taken, and further that I am not a relative or
23 employee of any attorney or counsel employed by the
24 parties hereto or financially interested in the
25 action.

William Jefferson Clinton

1 In witness whereof, I have hereunto set my hand
2 and affixed my seal this 23rd day of January,
3 A.D., 1998.

4
5 

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Paula Jones v. William Jefferson Clinton and Danny Ferguson
No. LR-C-94-290 (E.D. Ark.)

DEPOSITION OF WILLIAM JEFFERSON CLINTON

Definition of Sexual Relations

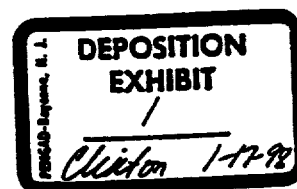
For the purposes of this deposition, a person engages in "sexual relations" when the person knowingly engages in or causes -

(1) contact with the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to arouse or gratify the sexual desire of any person;

~~Struck~~ (2) contact between any part of the person's body or an object and the genitals or anus of another person; or

~~Struck~~ (3) contact between the genitals or anus of the person and any part of another person's body.

7. "Contact" means intentional touching, either directly or through clothing.



Paula Jones v. William Jefferson Clinton and Danny Ferguson
No. LR-C-94-290 (E.D. Ark.)

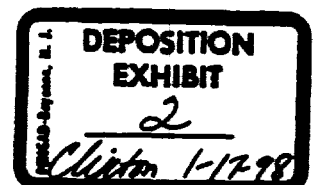
DEPOSITION OF WILLIAM JEFFERSON CLINTON

Definition of Sexual Assault and Offense of Sexual Assault

For the purposes of this deposition, a person commits a "sexual assault" and commits an "offense of sexual assault" when the person commits a crime under Federal law or the law of a State that involved -

- (1) any conduct proscribed by Section 2244(b) of title 18, United States Code;
- (2) contact, without consent, between any part of the defendant's body or an object and the genitals or anus of another person;
- (3) contact, without consent, between the genitals or anus of the defendant and any part of another person's body; or
- (4) an attempt or conspiracy to engage in conduct described in paragraphs (1) and (2).

"Contact" means intentional touching, either directly or through clothing.



§ 2244. Abusive sexual contact

(a) Sexual conduct in circumstances where sexual acts are punished by this chapter. [18 USCS §§ 2241 et seq.] Whoever, in the special maritime and territorial jurisdiction of the United States or in a Federal prison, knowingly engages in or causes sexual contact with or by another person, if so to do would violate—

(1) section 2241 of this title had the sexual contact been a sexual act, shall be fined under this title, imprisoned not more than ten years, or both;

(2) section 2242 of this title had the sexual contact been a sexual act, shall be fined under this title, imprisoned not more than three years, or both;

(3) subsection (a) of section 2243 of this title had the sexual contact been a sexual act, shall be fined under this title, imprisoned not more than two years, or both; or

(4) subsection (b) of section 2243 of this title had the sexual contact been a sexual act, shall be fined not more than \$5,000, imprisoned not more than six months, or both.

(b) In other circumstances. Whoever, in the special maritime and territorial jurisdiction of the United States or in a Federal prison, knowingly engages in sexual contact with another person without that other person's permission shall be fined not more than \$5,000, imprisoned not more than six months, or both.

§ 2245. Definitions for chapter

As used in this chapter [18 USCS §§ 2241 et seq.]—

(1) the term "prison" means a correctional, detention, or penal facility;

(2) the term "sexual act" means—

(A) contact between the penis and the vulva or the penis and the anus, and for purposes of this subparagraph contact involving the penis occurs upon penetration, however slight;

(B) contact between the mouth and the penis, the mouth and the vulva, or the mouth and the anus; or

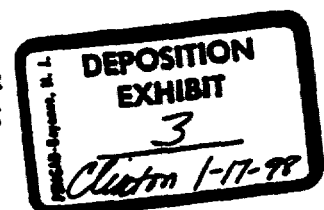
(C) the penetration, however slight, of the anal or genital opening of another by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person; and

(3) the term "sexual contact" means the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person;

(4) the term "serious bodily injury" means bodily injury that involves a substantial risk of death, unconsciousness, extreme physical pain, protracted and obvious disfigurement, or protracted loss or impairment of the function of a bodily member, organ, or mental faculty;

(5) the term "official detention" means—

(A) detention by a Federal officer or employee, or under the direction of a Federal officer or employee, following arrest for an offense;

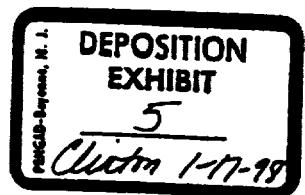


following surrender in lieu of arrest for an offense; following a charge or conviction of an offense, or an allegation or finding of juvenile delinquency; following commitment as a material witness; following civil commitment in lieu of criminal proceedings or pending resumption of criminal proceedings that are being held in abeyance, or pending extradition, deportation, or exclusion; or

(B) custody by a Federal officer or employee, or under the direction of a Federal officer or employee, for purposes incident to any detention described in subparagraph (A) of this paragraph, including transportation, medical diagnosis or treatment, court appearance, work, and recreation;

but does not include supervision or other control (other than custody during specified hours or days) after release on bail, probation, or parole, or after release following a finding of juvenile delinquency.

Office of the Governor
Sexual Harassment Policy



I. PURPOSE

This policy is established to encourage employees to discuss problems of sexual harassment with appropriate supervisors, to explain, to reach resolution, to make adjustments, if necessary, and to foster better understanding between employees and supervisors. Such discussion will lead to better employee/supervisor understanding of policies, procedures and practices.

II. POLICY

It is the policy of this Office that sexual harassment, as defined in the Federal Guidelines (29 CFR Ch XIV, subsection 1604.11), Section 703 of Title VII of the Civil Rights Act of 1964, as amended, and Arkansas Act 563 of 1985, which amends Subsection (8) of Section 1801 of Act 280 of 1975 in the Arkansas Criminal Code, is intolerable and unconscionable.

It also is the policy of this Office that all employees be given the opportunity through established steps and processes as specified in the Office's grievance procedure, to resolve sexual harassment complaints. This policy does not reflect any change in the Office's grievance procedure.

III. CRITERIA

The criteria of sexual harassment, as specified by the Federal Guidelines, is:

- (A) Submission to the conduct is either an explicit or implicit term or condition of employment and/or;
- (B) Submission to or rejection of the conduct is used as a basis for employment decisions affecting the person who did the submitting or rejecting and/or;
- (C) The conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Actions that may be defined as sexual harassment are not limited to the "supervisor to employee" situation, but may include actions of co-workers, actions of the same or opposite sex and actions of individuals external to the agency, but who have contact with employees in the work environment.

Such unwelcome behavior may be either physical or verbal in nature. Examples include, but are not limited to the following:

Overt Actions - actual rape or sexual assault,
though it is a one time occurrence

CC-00271

Continuing Action - a pattern of behavior or practice conducted on a continuing basis, i.e. including, but not limited to: abusive language, demeaning language, derogatory remarks, questions regarding sexual preferences or activities, and/or explicit/implicit materials

Covert Actions - may include any or all of the actions listed under continuing actions.

Examples of sexual harassment as defined by Act 563 of 1985 to amend Subsection (8) of Act 280 of 1975 (Arkansas Criminal Code) include:

"Sexual Contact" means any act of sexual gratification involving the touching directly or through clothing the sex organs, or buttocks, or anus of a person or the breast(s) of a female.

IV. NOTIFICATION

This Office's grievance procedure authorizes the Grievance Officer to modify, waive, or otherwise change the Grievance Procedure in order to fulfill the intent of the procedure, provided the agency director and employee agree to the waiver, modification or change. To this effect, no employee, in order to effect resolution, shall be required to solely or independently confront the person allegedly conducting or causing the action believed to be sexual harassment.

Employees believing themselves to be victims of sexual harassment are encouraged to come forward in order to effect resolution of the complaint. Employees are encouraged to contact the appropriate level supervisor(s) or the appropriate grievance officer to begin the process of resolution.


Governor

December 1, 1987

Date

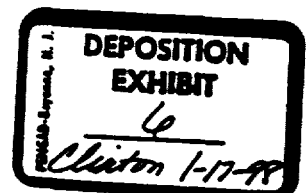
Third Annual Governor's Quality Conference

Excelsior Hotel
Little Rock, Arkansas

Wednesday, May 8, 1991

AGENDA

- 7:30 Registration
- 8:00 Welcome, Introduction
Dave Harrington, *Executive Director, AIDC*
- Opening Remarks
Bill Clinton, *Governor, State of Arkansas*
- 8:30 Total Systems Approach to Quality Manufacturing
Lew Springer, *Former Senior Vice President with
Campbell Soup Company*
- 10:00 *Break*
- 10:20 Lew Springer — continued
- 12:15 *Lunch*
- 1:15 The Improvement Process: How America's Leading
Companies Improve Quality
Jim Harrington, *International Quality Advisor for Ernst and Young*
- 2:15 *Break*
- 2:30 Jim Harrington — continued
- 3:30 Questions and Answers
Dave Harrington, Moderator
- 4:00 Adjourn



April 1, 1991

MEMORANDUM

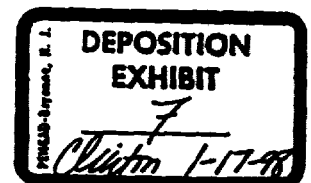
TO: Nancy Hernrich
FROM: Jan Partain *JP*
RE: Governor's role in Quality Conference

The agenda for the Governor's Quality Conference on May 3 is enclosed, as well as the mail-outs we have done thus far.

We had planned for the Governor to kick off and to wrap up the conference; however, his presence for the entire day would be significant. The meeting is designed specifically for top managers, and they are requested not to send substitutes.

Please call me at 27327 if you have questions.

cc: Dave Harrington
Jim Blakley



Third Annual Governor's Quality Conference
Wednesday, May 8, 1991
Excelsior Hotel

8:00 Introductions
Dave introduces Governor

Governor talks about importance of Quality Management to manufacturers and thus to the state's economy, QM in state government, continued commitment to QM across the country, etc.

Governor introduces speakers.

8:30 Lew Springer

10:00 Break

10:30 Lew Springer

12:00 Lunch

1:00 Jim Harrington

2:00 Break

2:30 Jim Harrington

3:30 Q & A

3:50 Wrap-up
Governor wraps-up

4:00 Adjourn



STATE OF ARKANSAS
OFFICE OF THE GOVERNOR
State Capitol
Little Rock 72201

Bill Clinton
Governor

March 22, 1991

Name
Company
Address
City

Dear

On May 8, 1991, I will host the third annual Governor's Quality Conference at the Excelsior Hotel in Little Rock. This event is designed especially for you, as top manager of your operation in Arkansas.

Everyday we are faced with new challenges -- a more competitive marketplace or more requests for services with fewer dollars to provide them. "The way we've always done things" will not satisfy the demands of today's customers.

Many people are finding the answer in a new way to manage, often referred to as "Quality Management." I was impressed by the impact of this philosophy in manufacturing settings, and have begun the process in my office, with my cabinet, and in eighteen state agencies.

Our experiences thus far have led me to believe that

- ** Quality Management works.
- ** It is hard to do.
- ** It is never finished.
- ** It demands a new culture.
- ** The top manager must lead this change.

I hope you will join me on May 8 to listen to experts: Lew Springer, formerly Vice President of Manufacturing, Campbell Soup Company; and Jim Harrington, author of The Improvement Process: How America's Leading Companies Improve Quality.

Their presentations may convince you to begin an immediate evaluation of your operation -- or reinforce the improvements you have already undertaken.

Your invitation will arrive very soon.

Sincerely,

Bill Clinton

BC:jp

DF Call

LD called. Said he urgently needed to speak to me.
Troopers being talked to
by lawyer - offered big \$.

He was part of - met with
lawyer - told if 3 would say same
thing, anyone would print

even if others denied, whether
about women, politics, etc. -

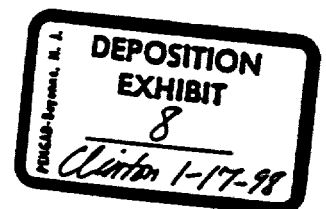
Offered "7 figures". If
go public - OK if not true as long
as stories straight, lawyers said -

hedging on how much he
said but clearly shared rumors
made stuff up

R. Perry talking about meeting
re: J. Miller, Calico Rock - me
cursing JJ - (BS - check deal)

LP wants \$ Will say anything

RP too - both need \$ bad, split
with wives - he and R. Anderson know it's
wrong, they don't know anything, all rumors
not good for their families or mine.



2

DF call

All mad because I didn't give jobs.
He was too - only BY maybe MA
got one.

R Perry mad because wrote memo
on Commission -- apparently not job he wanted
no response -- I said I never saw any
letter from R P. Why didn't someone
say something to Ark office -- I had been
good to FOP when RP Pres -- always tried
to help. -- DF had no answer.

DF call -2

Said lawyer who got them together
Cliff Jackson - with another lawyer

Working with David Brock, American Spectator
also LA Times reporter Bill Rummel

Rumors re: Beth Coulson, K Arnold, Susie
LP says took KA to airport, me to
Susie's

Going after BY - claiming he took care of
GFlowers. Paid some phone bills

Tried to get old sec. together - invited
J. Spear and M. Kobcrin

He & Sheila trying to stop rumors now -

Claims he went to first meeting to see what they were doing, played along with
--

I say not true - he says he knows
but wants to stay out of like Ronnie

says big \$ in maybe
from Tx [behind] [?] Jackson - he says GOP
in on - now talking about
100 G/7 years - job and whatever get from
book -

JGT real upset

D feels threatened, under pressure

RP threatening everybody - not sure
what that means

DF

LA Bill Remmel threatened

DF "If you not [confirm/confess] [?] I'll
use your name"

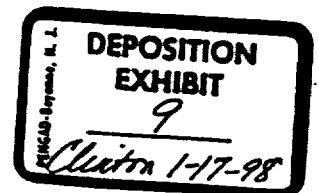
Saying I gave jobs/favors

BY helped with J. Spear, R. Anderson

DF with his consulting firm

D says BS - only 100/month-these
guys - Jackson, et al - offering
100 g year for years and book

He told JGT he want any part of
not want to talk anyone --



RESPONSE TO INTERROGATORY NO. 20: Other than the parties to this lawsuit, the individuals listed below are likely to have discoverable and relevant information regarding disputed facts in this case:

- | | |
|--------------------------|----------------------------|
| • Debra Ballentine | • David McKinney |
| • Pam Blackard | • Susan Carpenter-McMillan |
| • Mark Brown | • Jerry Odom |
| • Charlotte Brown | • Clydine Pennington |
| • Cherry Duckett | • Jan Partain |
| • Sherry Enderle | • Carol Phillips |
| • Mark Eubanks | • Phil Price |
| • Diane Evans | • Linus Raines |
| • Carl Fulkerson | • Judith Regan |
| • Russell "Rusty" Garner | • Alfred Regnery |
| • Michael Gauldin | • L'Donna Shaver |
| • David Harrington | • Sharon Shealey |
| • Cindy Hays | • Scott Waxman |
| • Pam Hood | • David Young |
| • Rachalle Jackson | • Adrian Zackheim |
| • Jon Janssen | |
| • Dennis Kirkland | |
| • Al Lowman | |

President Clinton will provide telephone numbers and addresses, to the extent they are known, in a supplemental response. President Clinton also reserves the right to supple-

ment this response with additional names pursuant to the Federal Rules of Civil Procedure and the Scheduling Order dated August 26, 1997.

INTERROGATORY NO. 21: Please state the name, address, and telephone number of each and every person to whom you have made one or more statements (regardless of whether or not they were written, oral, formal, informal, on-the-record, or off-the-record) about anything that happened on May 8, 1991, at the Excelsior Hotel in Little Rock, Arkansas.

RESPONSE TO INTERROGATORY NO. 21: President Clinton objects to this Interrogatory to the extent it seeks privileged information. Other than privileged conversations, President Clinton has no specific recollection of making any statement regarding the events alleged to have occurred on May 8, 1991 at the Excelsior Hotel in Little Rock, Arkansas. On occasion, however, the President has denied the allegations to members of his staff.

INTERROGATORY NO. 22: Please state the name, address, and telephone number of each and every person to whom you have made one or more statements (regardless of whether or not they were written, oral, formal, informal, on-the-record, or off-the-record) about anything that you said to Paula Jones, or anything that you did in the presence of Paula Jones, on May 8, 1991, at the Excelsior Hotel in Little Rock, Arkansas.

RESPONSE TO INTERROGATORY NO. 22: President Clinton objects to this Interrogatory to the extent it seeks privileged information. Other than privileged conversations, President Clinton has no recollection of making any statement regarding "anything ... said to Paula Jones" or anything done "in the presence of Paula Jones, on May 8, 1991, at the Excelsior Hotel in Little Rock, Arkansas."

INTERROGATORY NO. 23: For each and every conversation (either in person or by telephone) that you have had with Defendant Ferguson at any time after you became President of the United States, please state the following:

- (a) The date of the conversation;
 - (b) Whether the conversation was in person or by telephone;
 - (c) If the conversation was by telephone, who initiated the call;
 - (d) The number of the telephone from which the call was placed; and
 - (d) Everything that was said during the conversation.
- (If you do not remember exactly what was said, please state the substance of what was said).

RESPONSE TO INTERROGATORY NO. 23:

President Clinton recalls having at least two telephone conversations with Trooper Ferguson after becoming President of the United States. He does not recall the dates upon which the

telephone calls were made. Trooper Ferguson initiated at least one telephone call. The President cannot be certain who initiated the other call. As to the substance of the telephone conversations, attached are handwritten notes taken by President Clinton. In addition to the above, President Clinton recalls seeing Trooper Ferguson at a conference in or around November 1993, and may have had a brief conversation with him at that time. He does not recall the substance of any such conversation.

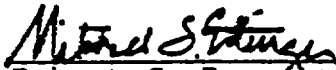
OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS.

1. President Clinton objects to the instructions to the extent that they: (a) seek privileged information; (b) seek information of which President Clinton has no personal knowledge; (c) impose requirements, obligations, and duties not required by the Federal Rules of Civil Procedure; (d) are overly broad, unduly burdensome, would impose undue hardship and result in the expenditure of unnecessary time and resources; (e) seek information that is not relevant under Federal Rule of Civil Procedure 26(b); and (f) are not calculated to lead to the discovery of admissible evidence.

2. The responses are subject to all of the objections to the interrogatories, instructions and definitions set forth herein. Nothing contained herein shall be deemed to constitute an assent to the terms or definitions used in the interrogatories, or to the admissibility of any response. These responses also are made without waiving the right to object to all or part of these

interrogatories should plaintiff request additional information. In the event these responses disclose any information that falls within an objection made herein, such disclosure is inadvertent and shall not constitute a waiver of the objection(s).

Dated: November 12, 1997


Robert S. Bennett, Esq.
Carl S. Rauh, Esq.
Mitchell S. Ettinger, Esq.
Amy Sabrin, Esq.
Katharine S. Sexton, Esq.
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Kathlyn Graves, Esq.
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200 West Capitol Avenue
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(501) 371-0808

Stephen Engstrom, Esq.
WILSON, ENGSTROM, CORUM, DUDLEY &
COULTER
809 West Third Street
Little Rock, Arkansas 72202
(501) 375-6453

Counsel to
President William J. Clinton

VERIFICATION

I, William Jefferson Clinton, declare as follows:

I have read the foregoing responses to Plaintiff's Third Set of Interrogatories and declare under penalty of perjury that they are true and correct to the best of my knowledge and belief.

Executed this 12th day of November, 1997.


William Jefferson Clinton

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of November, 1997, a true and correct copy of President Clinton's Responses to Plaintiff's Third Set of Interrogatories was served via federal express and first class United States Mail postage prepaid to:

Bill W. Bristow, Esq.
216 East Washington
Jonesboro, Arkansas 72401

Donovan Campbell, Jr., Esq.
Radar, Campbell, Fisher & Pyke
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207

Mitchell S. Ettinger
Mitchell S. Ettinger

**ATTACHMENT
TO PRESIDENT CLINTON'S RESPONSES TO
PLAINTIFF'S THIRD SET OF INTERROGATORIES**

THE WHITE HOUSE
WASHINGTON

DFau ~~XXXX~~

Heard 20 something needed to get to
troops being killed to
by lawyers - offered big \$

he was part of - met w/
lawyer - told if I would say some
thing, anyone would profit
even if there were others
about women, not etc -

offered "7 figures". if ~~the~~
go further - OK if it is true or long
in money, might "large" and

helping on law with it
said but clearly ~~the~~ that had been
used half up

R. P. was telling about meeting
w: J. Miller, Calvin Rock - the
coming to - (B - church)

(P) was to be with my agency
R. P. was to be with my agency
w/ with the to be with my agency
wrong, they don't know anything about it
~~the~~ to be with my agency

THE WHITE HOUSE
WASHINGTON

2

DF can.

all need be I didn't give it
in water - only by myself
Q & A.

DF can read the words
on cover it appears to be - incorrect
in response I did not see any
letter to DF why didn't someone
mention it to me after - I had been
going to see DF for a long time
to help - DF said to me.

WJC-0000002

**THE WHITE HOUSE
WASHINGTON**

DFW ~~2-1-1~~

Anne Murray who got them to go to
 City & back - where he was
 working w/ David Brady then. Spencer
 also LA then. Spencer then. Spencer
 then he got looking for Spencer
 LA then took LA to airport, Spencer then
 got after him - Spencer he took away
 from LA. Spencer then
 tried to get out see. Spencer then
 then. Spencer then.
 then tried to get Spencer now -
 then Spencer then to LA then to the
 west then Spencer then. Spencer then
 then he tried to get out of LA then
 but Spencer then. Spencer then
 then he tried to get out of LA then
 from LA then. Spencer then
 then - Spencer then
 1006 (7 yrs - job + where get from
 book -
 Job then. Spencer then
 D then. Spencer then
 R then. Spencer then
 then. Spencer then

WJC-0000003

THE WHITE HOUSE
WASHINGTON

DF

LA Admin. District
DF of you to confer & "H"
un of new"

say (green job) for -
my helped us to get rid of
BS of his countryman -

D sup BS - only 100/100 - Back
group - Jackson etc - offering
100% of the for the food -

he told us he wanted any thing
we want to talk to anyone -

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

PAULA CORBIN JONES,	:	
	:	
Plaintiff,	:	CIVIL ACTION
	:	NO. LR-C-94-290
v.	:	
	:	
WILLIAM JEFFERSON CLINTON	:	Judge Susan Webber Wright
	:	
and	:	
	:	
DANNY FERGUSON,	:	
	:	
Defendants.	:	

PRESIDENT CLINTON'S RESPONSES TO
PLAINTIFF'S FIRST SET OF INTERROGATORIES

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, President Clinton, through counsel, submits the following responses and objections to Plaintiff's First Set of Interrogatories.

RESPONSES

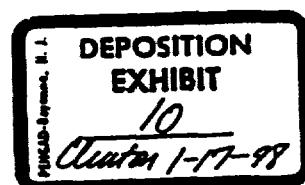
INTERROGATORY NO. 1:

Were you alone with Plaintiff in a room at the Excelsior Hotel in Arkansas on May 8, 1991? If so,

- a. Describe all events taking place in that room, and
- b. Identify all conversation on May 8, 1991, concerning Plaintiff.

RESPONSE TO INTERROGATORY NO. 1:

President Clinton has no recollection of ever meeting Plaintiff, or of being alone with Plaintiff in a room at the Excelsior Hotel in Arkansas on May 8, 1991, or at any other time.



INTERROGATORY NO. 2:

Identify any person to whom you issued or gave any directive, request or suggestion to bring, direct or escort Plaintiff to any room or place at the Excelsior Hotel. Describe any such directive, request, or suggestion and state whether such directive, request or suggestion was followed.

RESPONSE TO INTERROGATORY NO. 2:

President Clinton has no recollection of making any directive, request or suggestion to anyone to bring, direct or escort Plaintiff to any room or place at the Excelsior Hotel on May 8, 1991 or at any other time.

INTERROGATORY NO. 3:

State whether there has ever been any physical contact between you and Plaintiff, and if so, describe it, state how and by whose agency it occurred, and provide the date or dates on which it occurred.

RESPONSE TO INTERROGATORY NO. 3:

President Clinton never engaged in any improper conduct whatsoever with Plaintiff. President Clinton has no recollection of ever meeting Plaintiff and therefore has no recollection of whether he may have shaken her hand or had some other incidental physical contact. President Clinton objects to Interrogatory No. 3 on the grounds that the phrase "by whose agency" is vague and ambiguous.

INTERROGATORY NO. 4:

State whether you have ever requested that Plaintiff engage in or perform any sexual act(s) with or on you, and if so,

- a. describe the nature of each requested act or acts;
- b. the date(s) of each such request;

c. whether Plaintiff consented to engage in or perform any sexual act with or on you, and whether she actually did so.

RESPONSE TO INTERROGATORY NO. 4:

No.

INTERROGATORY NO. 5:

Identify any communication you have had concerning Plaintiff, her actions, her appearance, her job performance, or any member of her family, with any person, including but not limited to:

- a. David Harrington or any other officer or employee of the Arkansas Industrial Development Commission;
- b. Any member or former member of the Arkansas State Police, including any conversation concerning any Trooper's recollection of any facts alleged in the Complaint in this case.

RESPONSE TO INTERROGATORY NO. 5:

a. President Clinton has no recollection of any communication concerning Plaintiff with David Harrington or any other officer or employee of the Arkansas Industrial Development Commission.

b. President Clinton has no recollection of any communication concerning Plaintiff with any former member of the Arkansas State Police. As to current members of the Arkansas State Police, President Clinton has a general recollection of speaking with Trooper Danny Ferguson who referenced Plaintiff.

President Clinton objects to Interrogatory No. 5 to the extent it is overly broad, unduly burdensome, contains no time period, seeks information not relevant under Federal Rule of Civil Procedure 26(b), is not calculated to lead to the discovery

of admissible evidence, seeks privileged information, and is governed by Instructions three and five.

INTERROGATORY NO. 6:

Identify any communication concerning employment, compensation or remuneration that you have had with or about any Trooper identified in your response to Interrogatory 5(b).

RESPONSE TO INTERROGATORY NO. 6:

President Clinton objects to Interrogatory No. 6 on the same grounds set forth in objection to Interrogatory No. 5 including, but not limited to, that it is overly broad and contains no time period. Notwithstanding these objections, President Clinton has no recollection of discussing employment, compensation or remuneration with any Trooper in connection with any communication concerning plaintiff.

OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

1. President Clinton objects to Instruction No. 3 on the grounds that it: (a) seeks privileged information; (b) seeks information of which President Clinton has no personal knowledge; (c) imposes requirements, obligations, and duties not required by the Federal Rules of Civil Procedure; (d) is overly broad, unduly burdensome, would impose undue hardship and result in the expenditure of unnecessary time and resources; (e) seeks information that is not relevant under Federal Rule of Civil Procedure 26(b); and (f) is not calculated to lead to the discovery of admissible evidence.

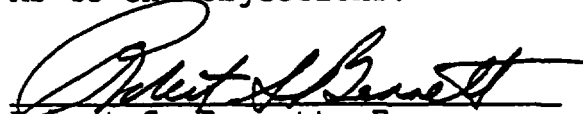
2. President Clinton objects to Instruction No. 5(b) (1-2) on the grounds that (a) it seeks the very information withheld on the grounds of privilege; and (b) in conjunction with the Interrogatories and Instructions, it is overly broad, unduly burdensome, would impose undue hardship and result in the expenditure of unnecessary time and resources.

3. The responses are subject to all of the objections to the interrogatories, instructions and definitions set forth herein. Nothing contained herein shall be deemed to constitute an assent to the terms or definitions used in the interrogatories, or to the admissibility of any response. These responses also are made without waiving the right to object to all or part of these interrogatories should plaintiff request additional information. In the event these responses disclose any information that falls within an objection made herein, such

disclosure is inadvertent and shall not constitute a waiver of the objection(s).

Dated: September 22, 1997

As to the objections:



Robert S. Bennett, Esq.
Carl S. Rauh, Esq.
Mitchell S. Ettinger, Esq.
Amy Sabrin, Esq.
Katharine S. Sexton, Esq.
Ellen L. Lyons, Esq.
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FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005
(202) 371-7000

Kathlyn Graves, Esq.
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(501) 371-0808

Stephen Engstrom, Esq
WILSON, ENGSTROM, CORUM, DUDLEY &
COULTER
809 West Third Street
Little Rock, Arkansas 72202
(501) 375-6453

Counsel to
President William J. Clinton

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of September, 1997, a true and correct copy of President Clinton's Responses to Plaintiff's First Set of Interrogatories was served via federal express and first class United States Mail postage prepaid to:

Bill W. Bristow, Esq.
216 East Washington
Jonesboro, Arkansas 72401

Paula C. Jones, Pro Se
One Third Place
#102
Long Beach, California 90802



Katharine S. Sexton

VERIFICATION

I, William Jefferson Clinton, declare as follows:

I have read the foregoing responses to Plaintiff's First Set of Interrogatories and declare under penalty of perjury that they are true and correct to the best of my knowledge and belief.

Executed this 30th day of September, 1997.


William Jefferson Clinton



2728 Oxford Terrace
Dallas, Texas 75205
(214) 750-8800 • (214) 343-6808

Bill,

I certainly enjoyed speaking
with you by phone!!

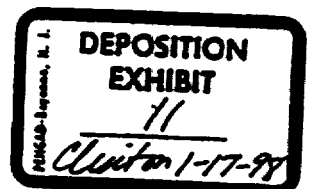
Enclosed, please find a
business resume and an entertainer
resume.

Anything you can do
is much appreciated!!

Thanks,

Jennifer

3/31 @ Parents home - interested in
417 739-4445
PR - Markety



CC-00486

idj 300
Jennifer Flowers
COMPANY

1 / 1
KLEIN
FEB 25 1991

Job

Dear Bill,

Since we've been unable to connect by phone, I thought I should drop you a note.

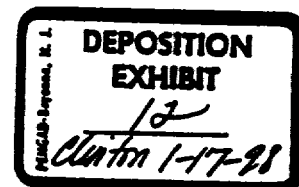
Judy has not been very successful in the job hunting area.

We been to one interview at Ark. Historical Heritage. It only pays \$15,200. a year, but, as of yet, I haven't been offered the position. When I asked Judy if there were anymore prospects, she said no. It took three weeks to come up with that one.

Bill, I've tried to explain my financial situation to you and how badly I need a job. Enclosed, is some correspondence that will be of interest to you. Unfortunately, it looks like I will have to pursue the law suit to, hopefully, get some money to live on, until I can get employment.

Please, be in touch.

Jennifer



At my reunion I saw Dolly Kife for the first time in a long time. She was obviously angry and yelling. After about three hours I was down enough to say hello to her as I did. She said something hateful back and I asked her what was bothering her. She began ranting about how I hadn't called her back during the '62 campaign when she called L. Nixon and left word for me. I suggested we move over to the side of the room and motioned Martha Scott to stand behind us so she could hear the entire conversation.

I explained to Dolly that I hadn't called her back because I knew her husband was trying to peddle some false story about me to a tabloid and that other women in touch with her about it; that both of us were better off if we could say we hadn't talked and that besides at the time she called me she hadn't told the tabloid the story was false. I said that I had seen a copy of a letter she wrote telling the tabloid not to publish the story because it was false and that I appreciated it. She replied that she had killed the story in another way and hadn't sent the letter. I had the impression she made some sort of deal with the tabloid people but she didn't say exactly what it was.

She kept chewing me out for not calling her back and not trusting her. I reminded her that millions of dollars had been offered to people to say damaging things and that the press would run with stories that were bought and paid for, supported by questionable evidence like doctored tapes, and not supported at all. I also reminded her that I had tried to be a friend to her as long as we had known each other going back to junior and senior high school. I reminded her of a time when she was having trouble in her first marriage more than 20 years ago when she called me in Connecticut and asked for advice. She looked at me with an almost crazed look and said she didn't want advice, she wanted me to come rescue her.

After awhile she started talking about her move. She reminded me that she had been through some tough times in the last several years and didn't have much

money to him on - & think she said she was doing some
publishing working work - but that for years she had
been working on writing. First she tried writing songs
(I remember this because she requested I get a songwriter
to listen to some of them several years ago) and then she
started working on a novel. She said her novel was
done and she was trying to find a publisher for it. She
said it involved a woman having a long affair with a
Southern governor and of course "like ^{all} a good fiction" it
was not autobiographical and she imagined & wouldn't
want it published. She said people would figure out
it was her she was writing about. When I pointed out
that it wasn't true, she said well I'll say it's just
fiction, just a story. She then rambled for several
minutes about how she had loved her for years since
she was very young, and through her two marriages, and
how I had never really been there for her because it
wasn't my friendship that she wanted. She said
she would say it was a fantasy but she needed
the money and she didn't care if it hurt her or
the presidency, that other had made money and
she felt abandoned. At the end of the conversation she
suddenly calmed down and said maybe she wouldn't
try to publish her book, at least now. She talked to me
about her son, of whom she was very proud and said
he wanted to go into politics and would like to visit the
White House. & said that he'd be welcome and we could let
it go through my Attorney's office to direct through the White
House. Before we stopped talking she said she really
didn't want to hurt me, that maybe it wasn't my fault
that I never got involved with her and made her fantasy
come true, but that she needed money. She must have
told for 30 minutes in an agitated state. When she left I
wasn't sure what she would do but I was glad I'd had
Martha listen to the conversation.

I stood by the President the entire conversation and heard
and watched her the entire time. The conversation lasted
over 30 minutes - closer to 45 and at times she was
very animated and threatening acting. I had been concerned

all evening and had been watching her carefully all evening.
It was a bizarre conversation because she repeatedly
said her story was not true but that she was angry
and needed money. She would throw out an accusation
and then say it was a lie. It was this erratic
behavior that made me stay so attentive to what she
was doing and saying.

Spencer Smith

At my reunion I saw Dolly Kyle for the first time in a long time. She was obviously angry and sulking. After about three hours I was close enough to say hello to her so I did. She said something hateful back and I asked her what was bothering her. She began ranting about how I hadn't called her back during the '92 campaign when she called L. Dixon and left word for me. I suggested we move over to the side of the room and motioned Marsha Scott to stand behind us so she could hear the entire conversation.

I explained to Dolly that I hadn't called her back because I knew her husband was trying to peddle some false story about us to a tabloid and that others were in touch with her about it; that both of us were better off if we could say we hadn't talked and that besides at the time she called me she hadn't told the tabloid the story was false. I said that later I had seen a copy of a letter she wrote telling the tabloid not to publish the story because it was false and that I appreciated it. She replied that she had killed the story in another way and hadn't sent the letter. I had the impression she made some sort of deal with the tabloid people but she didn't say exactly what it was.

She kept chewing me out for not calling her back and not trusting her. I reminded her that millions of dollars had been offered to people to say damaging things and that the press would run with stories that were bought and paid for, supported by questionable evidence like doctored tapes, and not supported at all. I also reminded her that I had tried to be a friend to her as long as we had known each other, going back to junior and senior high school. I reminded her of a time when she was having trouble in her first marriage more than 20 years ago when she called me in Connecticut and asked for advice. She looked at me with an almost crazed look and said she didn't want advice, she wanted me to come rescue her.

After a while she started talking about her novel. She reminded me that she had been

through some tough times in the last several years and didn't have much money to live on - I think she said she was doing some public interest housing work - but that for years she had been working on writing. First she tried writing songs (I remember this because at her request I got a songwriter to listen to some of them several years ago) and then she started working on a novel. She said her novel was done and she was trying to find a publisher for it. She said it involved a woman having a love affair with a Southern governor and of course "like all good fiction" it was sort of autobiographical and she imagined I wouldn't want it published. She said people would figure out it was me she was writing about. When I pointed out that it wasn't true, she said "well I'll say it's just fiction, just a story." She then rambled for several minutes about how she had loved me for years since she was very young, and through her two marriages, and how I had never really been there for her because it wasn't my friendship that she wanted. She said she would say it was a fantasy but she needed the money and she didn't care if it hurt me or the presidency, that others had made money and she felt abandoned. At the end of the conversation she suddenly calmed down and said maybe she wouldn't try to publish her book, at least now. She talked to me about her son, of whom she was very proud and said he wanted to go into politics and would like to visit the White House. I said that he'd be welcome and we could set it up through my Arkansas office or direct through the White House. Before we stopped talking she said she really didn't want to hurt me, that maybe it wasn't "my fault" that I never got involved with her and made her fantasy come true but that she needed money. She must have talked for 30 minutes in an agitated state. When I left I wasn't sure what she would do but I was glad I'd had Marsha listen to the conversation.

I stood by the President the entire conversation and heard and watched her the entire time.

The conversation lasted over 30 minutes - closer to 45 and at times she was very animated and threatening acting. I had been concerned all evening and had been watching her carefully all evening. It was a bizarre conversation because she repeatedly said her story was not true but that she was angry and needed money. She would throw out an accusation and then say it was a lie. It was this erratic behavior that made me stay so attentive to what she was doing and saying.

Marsha Scott

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

PAULA CORBIN JONES,

Plaintiff,

v.

WILLIAM JEFFERSON CLINTON

and

DANNY FERGUSON,

Defendants.

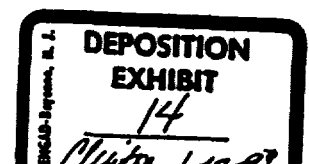
CIVIL ACTION
NO. LR-C-94-290

Judge Susan Webber Wright

UNDER SEAL

PRESIDENT CLINTON'S SUPPLEMENTAL RESPONSES
TO PLAINTIFF'S SECOND SET OF INTERROGATORIES

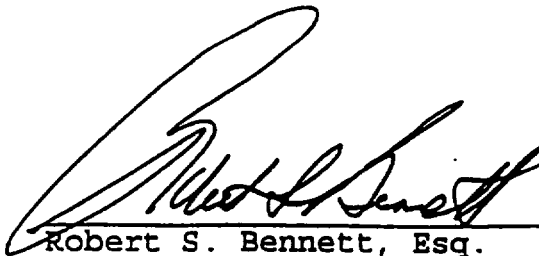
Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, President Clinton, through counsel, submits the following supplemental responses to Plaintiff's Second Set of Interrogatories pursuant to and in accordance with the Court's Order dated December 11, 1997. In this regard, in providing these supplemental responses, President Clinton considers each of the interrogatories to have been modified in scope and content as directed by the Court's Order and the discovery conferences held on these issues. Specifically, the relevant time period established by the Court is May 8, 1986 to the present. The subject matter of the interrogatories has been modified to encompass individuals who were state or federal employees, or whose liasons with then-Governor Clinton were procured, protected, concealed, and/or facilitated by State Troopers assigned to his security detail.



SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 10 (as modified by direction of the Court): None.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 11 (as modified by direction of the Court): None.

SUPPLEMENTAL RESPONSE TO INTERROGATORY NO. 17 (as modified by direction of the Court): As Governor of Arkansas and President of the United States, Mr. Clinton has attended literally hundreds of meetings both on and off state and federal property between 1986 and the present, and cannot recall which, if any, meetings were attended only by himself and a federal or state female employee at a location other than his office. Accordingly, he is unable to identify who, if anyone, arranged such a meeting. If it were necessary to attend a private meeting with a female or male outside the office, such meetings would have been arranged by either the office of the person with whom he met, by a member of his staff or by himself. See also supplemental responses to Interrogatories 10 and 11 above.



Robert S. Bennett, Esq.
Carl S. Rauh, Esq.
Mitchell S. Ettinger, Esq.
Amy Sabrin, Esq.
Katharine S. Sexton, Esq.
Ellen L. Lyons, Esq.
SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP
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Washington, D.C. 20005
(202) 371-7000

Kathlyn Graves, Esq.
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Suite 2200
Little Rock, Arkansas 72201
(501) 371-0808

Stephen Engstrom, Esq.
WILSON, ENGSTROM, CORUM, DUDLEY &
COULTER
809 West Third Street
Little Rock, Arkansas 72202
(501) 375-6453

Counsel to
President William J. Clinton

Dated: December 23, 1997

VERIFICATION

I, William Jefferson Clinton, declare as follows:

I have read the foregoing supplemental responses to Plaintiff's Second Set of Interrogatories and declare under penalty of perjury that they are true and correct to the best of my knowledge and belief.

Executed this 23rd day of December, 1997.

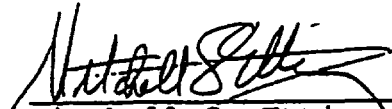

William Jefferson Clinton

CERTIFICATE OF SERVICE

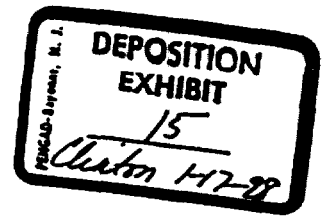
I hereby certify that on this 23rd day of December, 1997, a true and correct copy of President Clinton's Supplemental Responses to Plaintiff's Second Set of Interrogatories was served via facsimile and federal express to:

Bill W. Bristow, Esq.
216 East Washington
Jonesboro, Arkansas 72401

Donovan Campbell, Jr., Esq.
Rader, Campbell, Fisher & Pyke
Stemmons Place, Suite 1080
2777 Stemmons Freeway
Dallas, Texas 75207



Mitchell S. Ettinger



AFFIDAVIT OF JANE DOE # 6

1. My name is Jane Doe #6. I am 24 years old and I currently reside at 700 New Hampshire Avenue, N.W., Washington, D.C. 20037.

2. On December 19, 1997, I was served with a subpoena from the plaintiff to give a deposition and to produce documents in the lawsuit filed by Paula Corbin Jones against President William Jefferson Clinton and Danny Ferguson.

3. I can not fathom any reason that the plaintiff would seek information from me for her case.

4. I have never met Ms. Jones, nor do I have any information regarding the events she alleges occurred at the Excelsior Hotel on May 8, 1991 or any other information concerning any of the allegations in her case.

5. I worked at the White House in the summer of 1995 as a White House intern. Beginning in December, 1995, I worked in the Office of Legislative Affairs as a staff assistant for correspondence. In April, 1996, I accepted a job as assistant to the Assistant Secretary for Public Affairs at the U.S. Department of Defense. I maintained that job until December 26, 1997. I am currently unemployed but seeking a new job.

6. In the course of my employment at the White House I met President Clinton several times. I also saw the President at a number of social functions held at the White House. When I worked as an intern, he appeared at occasional functions attended by me and several other interns. The correspondence I drafted while I worked at the Office of Legislative Affairs was seen and edited by supervisors who either had the President's signature affixed by mechanism or, I believe, had the President sign the correspondence itself.

7. I have the utmost respect for the President who has always behaved appropriately in my presence.

8. I have never had a sexual relationship with the President, he did not propose that we have a sexual relationship, he did not offer me employment or other benefits in exchange for a sexual relationship, he did not deny me employment or other benefits for rejecting a sexual relationship. I do not know of any

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE # 6 by her subscribed, that the matters stated herein are true to the best of her information, knowledge and belief.

Monica S. Lewinsky
MONICA S. LEWINSKY

SUBSCRIBED AND SWORN to before me this 7th day of January, 1998.

Kathleen M. Grimes
NOTARY PUBLIC, D.C.
My Commission expires:

My Commission Expires August 31, 1998

other person who had a sexual relationship with the President, was offered employment or other benefits in exchange for a sexual relationship, or was denied employment or other benefits for rejecting a sexual relationship. The occasions that I saw the President after I left my employment at the White House in April, 1996, were official receptions, formal functions or events related to the U.S. Department of Defense, where I was working at the time. There were other people present on those occasions.

9. Since I do not possess any information that could possibly be relevant to the allegations made by Paula Jones or lead to admissible evidence in this case, I asked my attorney to provide this affidavit to plaintiff's counsel. Requiring my deposition in this matter would cause disruption to my life, especially since I am looking for employment, unwarranted attorney's fees and costs, and constitute an invasion of my right to privacy.

I declare under the penalty of perjury that the foregoing is true and correct.

Monica S. Lewinsky

MONICA S. LEWINSKY

DISTRICT OF COLUMBIA, ss:

MONICA S. LEWINSKY, being first duly sworn on oath according to law, deposes and says that she has read the foregoing AFFIDAVIT OF JANE DOE # 6 by her subscribed, that the matters stated herein are true to the best of her information, knowledge and belief.

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