

REQUESTS FOR ADMISSION OF THE PRESIDENT OF THE UNITED STATES
RELATED TO HOUSE RESOLUTION 581
SUBMITTED BY THE HONORABLE HENRY J. HYDE, CHAIRMAN
COMMITTEE ON THE JUDICIARY
U.S. HOUSE OF REPRESENTATIVES

AND

SELECTED CITATIONS TO THE RECORD OF EVIDENCE AND LAW
RELATED TO THE REQUESTS FOR ADMISSION

1. **Q: Do you admit or deny that you are the chief law enforcement officer of the United States of America?**
1. R: Article II, Section 3 of the U.S. Constitution states in part that the President shall “take Care that the Laws be faithfully executed.” Article II, Section 1, clause 1 of the Constitution vests the entire executive branch of government, which includes the United States Department of Justice, in the President. He authorizes, through the Attorney General, all prosecutions brought on behalf of the people of the United States in carrying out his constitutional duty to take care that the laws be faithfully executed.
2. **Q: Do you admit or deny that upon taking your oath of office that you swore you would faithfully execute the office of President of the United States, and would to the best of your ability, preserve, protect and defend the Constitution of the United States?**
2. R: Article II, Section 1, clause 8 of the U.S. constitution states that before the President enters on the execution of his office, he shall take, and William J. Clinton did take, the following oath or affirmation: “I do solemnly swear (or affirm) that I will faithfully execute the Office of President of the United States, and will to the best of my Ability, preserve, protect and defend the Constitution of the United States.”
3. **Q: Do you admit or deny that, pursuant to Article II, section 2 [sic] of the Constitution, you have a duty to “take care that the laws be faithfully executed?”**
3. R: Article II, Section 3 of the United States Constitution states in part that the President shall “take Care that the Laws be faithfully executed.”
4. **Q: Do you admit or deny that you are a member of the bar and officer of the court of a state of the United States, subject to the rules of professional responsibility and ethics applicable to the bar of that state?**
4. R: The Arkansas Rules of Court and Rules of Professional Conduct governing the

actions of lawyers licensed to practice law in the State of Arkansas declare that it is professional misconduct for a lawyer to “commit a criminal act that reflects adversely on the lawyers honesty, trustworthiness or fitness as a lawyer in other respects; engage in conduct involving dishonesty, fraud, deceit or misrepresentation; or engage in conduct that is prejudicial to the administration of justice.” (Arkansas Rules of Professional Conduct, Rule 8.4 (b-d)).

The comments following Rule 8.4 assert that “lawyers holding public office assume legal responsibilities going beyond those of other citizens. A lawyer’s abuse of public office can suggest an inability to fulfill the professional role of attorney.”

Furthermore, “Every attorney now or hereafter licensed to practice law in the State of Arkansas shall be a member of the bar of this State and subject to these procedures. The jurisdiction of the Supreme Court Committee on Professional Conduct shall extend to lawyers on inactive or suspended status.” (Arkansas Procedures of the Court Regulating Professional Conduct of Attorneys at Law, Section 1 (A)).

5. Q: **Do you admit or deny that you took an oath in which you swore or affirmed to tell the truth, the whole truth, and nothing but the truth, in a deposition conducted as part of a judicial proceeding in the case of *Jones v. Clinton* on January 17, 1998?**

5. R: The record indicates that on January 17, 1998, before beginning to respond to questions during a deposition in a civil rights lawsuit in which he was a named defendant, the President answered in the affirmative to the question “Do you swear and affirm that your testimony will be the truth, the whole truth and nothing but the truth, so help you God?”

6. Q: **Do you admit or deny that you took an oath in which you swore or affirmed to tell the truth, the whole truth, and nothing but the truth, before a grand jury empaneled as part of a judicial proceeding by the United States District Court for the District of Columbia Circuit on August 17, 1998?**

6. R: The record indicates that on August 17, 1998, before testifying before a grand jury empaneled by the United States District Court for the District of Columbia Circuit to investigate whether the President committed acts of perjury, subornation of perjury, obstruction of justice and witness tampering, President Clinton, having been called for examination by the Independent Counsel, answered in the affirmative to the question “Do you swear and affirm that your testimony will be the truth, the whole truth and nothing but the truth, so help you God?”

7. Q: **Do you admit or deny that on or about October 7, 1997, you received a letter composed by Monica Lewinsky in which she expressed dissatisfaction with her**

search for a job in New York?

7. R: The record indicates that “on October 7, 1997, Ms. Lewinsky may have couriered a letter expressing dissatisfaction with her job search to the President.” (H. Doc. 105-310, p. 181; see also Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 102-03, H. Doc. 105-311, p. 988).

8. Q: **Do you admit or deny that you telephoned Monica Lewinsky early in the morning on October 10, 1997, and offered to assist her in finding a job in New York?**

8. R: The record indicates that “Lewinsky advised that on October 9 or 10, 1997, Clinton called her between 2:00 and 2:30 in the morning. Lewinsky advised she was asleep when Clinton called. The call lasted for approximately one and one half-hours. Lewinsky and Clinton had their biggest fight ever in this telephone conversation. Clinton said that if he had known how difficult it would be to bring Lewinsky back to the White House, he would have never let her be transferred in the first place. Clinton said he was obsessed with her career and wanted to help her. Clinton said he would get working on a job in New York for Lewinsky.” (7/31/98 OIC interview of Monica Lewinsky, pp. 10-11, H. Doc. 105-311, pp. 1460-61; see also Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 104, H. Doc. 105-311, p. 988).

9. Q: **Do you admit or deny that on or about October 11, 1997, you met with Monica Lewinsky in or about the Oval Office dining room?**

9. R: The record indicates that on “October 11, 1997, at approximately 8:30 a.m., Currie called Lewinsky from the hospital and said Clinton wanted to see Lewinsky at approximately 9:00 a.m., at the White House. Currie told Lewinsky that Clinton had paged Currie to tell her to get in touch with Lewinsky. Lewinsky met alone with Clinton in the dining room.” (7/31/98 OIC interview of Monica Lewinsky, p. 11, H. Doc. 105-311, p. 1461; see also Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 104, H. Doc. 105-311, p. 988.)

10. Q: **Do you admit or deny that on or about October 11, 1997, Monica Lewinsky furnished to you, in or about the Oval Office dining room, a list of jobs in New York in which she was interested?**

10. R: The record indicates that on October 11, 1998, President Clinton instructed Monica Lewinsky to draft a list of jobs in which she was interested:

“Q At some point, did you send the President something like a list of jobs or interests that you might have in New York?

A Yes. He asked me to prepare that on the 11th of October.”
(Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 103-104, H. Doc. 105-311, p. 988).

“Lewinsky advised that Clinton asked her to write a list of potential employers, or jobs she was interested in, and to give it to him. On October 16, 1997, Lewinsky sent Clinton the list, which she refers to as a ‘wish list.’” (8/13/98 OIC interview of Monica Lewinsky, p. 3, H. Doc. 105-311, p. 1545).

11. Q: **Do you admit or deny that on or about October 11, 1997, you suggested to Monica Lewinsky that Vernon Jordan may be able to assist her in her job search?**

11. R: The record indicates that the President made such a suggestion:

“Q What do you have in mind about the first time Vernon Jordan's name would have come up in conversations with the President?

A It was either in that phone call or [at the meeting] on October 11th.

Q And tell us what was said about Vernon Jordan, whether it was in the phone call or on the 11th.

A I don't remember. I know that I had discussed with Linda and either I had thought or she had suggested that Vernon Jordan would be a good person who is a close friend of the President and who has a lot of contacts in New York, so that he might be someone who might be able to help me procure a position in New York, if I didn't want to go to the U.N.

Q And what was the President's response?

A I think that was a good idea?”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 103-104, H. Doc. 105-311, p. 988)

“Following this conversation, Ms. Lewinsky requested of the Pres. that he ask Vernon Jordan to help secure her a non-governmental position in NY. He agreed to ask Mr. Jordan.” (2/1/98 Handwritten proffer of Monica Lewinsky, H. Doc. 105-311, p. 710; see also H. Doc. 105-311, p. 1212.)

12. Q: **Do you admit or deny that on or about October 11, 1997, after meeting with Monica Lewinsky and discussing her search for a job in New York, you telephoned Vernon Jordan?**

12. R: The record indicates that on October 11, 1997, at 10:57 a.m., after meeting with Monica Lewinsky beginning at 9:00 a.m., President Clinton called Vernon Jordan by telephone. (Presidential call log, H. Doc. 105-311, p. 2829.)

13. Q: **Do you admit or deny that you discussed with Monica Lewinsky prior to December 17, 1997, a plan in which she would pretend to bring you papers with a work-related purpose, when in fact such papers had no work-related purpose,**

in order to conceal your relationship?

13. R: The record indicates that such a plan existed. Monica Lewinsky provided the following testimony under oath regarding this subject:

“Q I would like to ask you some questions about any steps you took to keep your relationship with the President secret.

A A lot.

Q All right. Well, why don't we just ask the question open-endedly and we'll follow up.

A Okay. I'm sure, as everyone can imagine, that this is a kind of relationship that you keep quiet, and we both wanted to be careful being in the White House. Whenever I would visit him during--when--during my tenure at the White House, we always--unless it was sort of a chance meeting on the weekend and then we ended up back in the office, we would usually plan that I would either bring papers, or one time we had accidentally bumped into each other in the hall and went from that way, so then we planned to do that again because that seemed to work well. But we always--there was always some sort of a cover.

Q When you say you planned to bring papers, did you ever discuss with the President the fact that you would try to use that as a cover?

A Yes.

Q Okay. What did the two of you say in those conversations?

A I don't remember exactly. I mean, in general, it might have been something like me saying, well, maybe once I got there kind of saying, “Oh, gee here are your letters,” wink, wink, wink, and him saying: “Okay that's good,” or--

Q And as part of this concealment, if you will, did you carry around papers when you went to visit the President while you worked at Legislative Affairs?

A Yes, I did.

Q Did you ever actually bring him papers to sign as part of business?

A No.

Q Did you actually bring him papers at all?

A Yes.

Q All right. And tell us a little about that.

A It varied. Sometimes it was just actual copies of letters. One time I wrote a really stupid poem. Sometimes I put gifts in the folder which I brought.

Q And even on those occasions, was there a legitimate business purpose to that?

A No.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 53-55, H. Doc. 105-311, p. 977)

President Clinton gave the following testimony under oath in his deposition the case of Jones v. Clinton regarding the subject:

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

A I don't know about several times. There was a period when the Republican Congress shut the government down that the whole White House was being run by interns, and she was assigned to work back in the chief of staff's office, and we were all working there, and so I saw her on two or three occasions then, and then when she worked at the White House, I think there was one or two other times when she brought some documents to me.”

(Deposition of President Clinton, 1/17/98, pp. 50-51 (released in news accounts)).

14. Q: **Do you admit or deny that you discussed with Monica Lewinsky prior to December 17, 1997, that Betty Currie should be the one to clear Ms. Lewinsky in to see you so that Ms. Lewinsky could say that she was visiting with Ms. Currie instead of with you?**

14. R: The record indicates the President had such discussions with Monica Lewinsky prior to December 17, 1997. Monica Lewinsky provided the following testimony under oath regarding this subject:

“Q Did you ever [prior to your conversation with the President on December 17] have discussions with the President about what you would say about your frequent visits with him after you had left legislative affairs?

A Yes.

Q Yes. What was that about?

A I think we--we discussed that--you know, the backwards route of it was that Betty always needed to be the one to clear me in so that, you know, I could always say I was coming to see Betty.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 55, H. Doc. 105-311, p. 977)

President Clinton was asked about this subject during his deposition on January 17, 1998:

“Q Has it ever happened that a White House record was created that reflected that Betty Currie was meeting with Monica Lewinsky when in fact you were meeting with Monica Lewinsky?

A Not to my knowledge.”

(Deposition Testimony of President Clinton in the case of *Jones v. Clinton*, 1/17/98).

15. Q: **Do you admit or deny that you discussed with Monica Lewinsky prior to December 17, 1997, that if either of you were questioned about the existence of your relationship you would deny its existence?**

15. R: The record indicates that such an agreement to deny existed between the President and Monica Lewinsky:

“Q Had you talked with [the President] earlier [than December 17] about ... false explanations about what you were doing visiting him on several occasions?

A Several occasions throughout the entire relationship. ...It was the pattern of the relationship to sort of conceal it.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 124, H. Doc. 105-311, p. 844).

16. Q: **Do you admit or deny that on or about December 6, 1997, you learned that Monica Lewinsky’s name was on a witness list in the case of *Jones v. Clinton*?**

16. R: The record indicates that according to the President’s sworn testimony, he had such knowledge:

“Q ...[W]hen did you find out that Monica’s name was on that witness list?

A “I believe that I found out late in the afternoon on the 6th.”

(Grand Jury Testimony of President Clinton, 8/17/98, p. 83, H. Doc. 105-311, p. 535).

17. Q: **Do you admit or deny that on or about December 17, 1997, you told Monica Lewinsky that her name was on the witness list in the case of *Jones v. Clinton*?**

17. R: The record indicates that the President told Monica Lewinsky about the appearance of her name on that date:

“Q . . . Did you come to have a telephone conversation with the President on

December 17?

A Yes. . . he told me he had some more bad news, that he had seen the witness list for the Paula Jones case and my name was on it. . . He told me that it didn't necessarily mean that I would be subpoenaed, but that that was a possibility, and if I were subpoenaed, that I should contact Betty and let Betty know that I had received the subpoena.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 123, H. Doc. 105-311, p. 843).

President Clinton was asked about this subject during his deposition on January 17, 1998:

“Q Did you ever talk with Monica Lewinsky about the possibility that she might be asked to testify on this case?

A Bruce Lindsey, I think Bruce Lindsay told me that she was, I think maybe that's the first person [who] told me she was. I want to be as accurate as I can. . . .

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

A I'm not sure, and let me tell you why I'm not sure. It seems to me the, the, the-I want to be as accurate as I can here. Seems to me the last time she was there to see Betty before Christmas we were joking about how you-all, with the help of the Rutherford Institute, were going to call every woman I'd ever talked to and ask them that, and so I said you would qualify, or something like that. I don't think we ever had more of a conversation than that about it. . . .”

(Deposition Testimony of President Clinton in the case of Jones v. Clinton, 1/17/98 pp. 70-71 (as released in public sources)).

18. Q: **Do you admit or deny that on or about December 17, 1997, you suggested to Monica Lewinsky that the submission of an affidavit in the case of *Jones v. Clinton* might suffice to prevent her from having to testify personally in that case?**

18. R: The record indicates that the President made such a suggestion on that date:

“A I believe I probably asked him, you know, what should I do in the course of that and he suggested, he said, ‘Well, maybe you can sign an affidavit.’ . . .

Q When he said that you might sign an affidavit, what did you understand it to mean at that time?

A I thought that signing an affidavit could range from anywhere -- the point of it would be to deter or to prevent me from being deposed and so that that could range from anywhere between maybe just somehow mentioning, you know, innocuous things or going as far as maybe having to deny any kind of relationship.” (Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 123-24, H. Doc. 105-311, pp. 843-44).

Furthermore, Monica Lewinsky has stated that she is “100% sure that the President suggested that she might want to sign an affidavit to avoid testifying.” (8/19/98 OIC interview of Monica Lewinsky, pp. 4-5 (H. Doc. 105-311, pp.1558-9).

19. Q: **Do you admit or deny that on or about December 17, 1997, you suggested to Monica Lewinsky that she could say to anyone inquiring about her relationship with you that her visits to the Oval Office were for the purpose of visiting with Betty Currie or to deliver papers to you?**

19. R: The record indicates that the President made such a suggestion on December 17, 1997:

“Q Did you come to have a telephone conversation with the President on December 17?

A Yes. . .

Q Tell us how the conversation went from there. . .

A . . . At some point in the conversation, and I don’t know if it was before or after the subject of the affidavit came up, he sort of said, ‘You know, you can always say you were coming to see Betty or that you were bringing me letters.’ Which I understood was really a reminder of things that we had discussed before.” (Grand Jury Testimony of Monica Lewinsky, 8/6/98, p.123, H. Doc. 105-311, p. 843).

20. Q: **Do you admit or deny that you gave false and misleading testimony under oath when you stated during your deposition in the case of *Jones v. Clinton* on January 17, 1998, that you did not know if Monica Lewinsky had been subpoenaed to testify in that case?**

20. R: The record indicates that despite evidence revealing the contrary, President Clinton swore in his deposition that he did not know if Monica Lewinsky had been subpoenaed to testify in that case:

“Q Did she tell you she had been served with a subpoena in this case?

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

Q Did anyone other than your attorneys ever tell you that Monica Lewinsky had been served with a subpoena in this case?

A I don't think so."

(Deposition Testimony of President Clinton in the case of Jones v. Clinton, 1/18/98, p. 68 (as released in public sources.))

"I said to the President, 'Monica Lewinsky called me.... She is coming to see me about this subpoena.'" (Grand Jury Testimony of Vernon Jordan, 5/5/98, p. 145 (referencing a December 19, 1997, telephone conversation with the President), H. Doc. 105-316, p. 1815).

21. Q: **Do you admit or deny that you gave false and misleading testimony under oath when you stated before the grand jury on August 17, 1998, that you did know prior to January 17, 1998, that Monica Lewinsky had been subpoenaed to testify in the case of *Jones v. Clinton*?**

21. R: The record indicates that President Clinton swore before the grand jury that he did know that Monica Lewinsky had been subpoenaed to testify in that case:

"[M]y recollection is that I knew by then, of course, that she had gotten a subpoena. And I knew that she was, therefore, was slated to testify. ... I remember a conversation about the possibility of her testifying. I believe it must have occurred on the 28th." (Grand Jury Testimony of President Clinton, 8/17/98, pp. 35-36, H. Doc 105-311, pp. 487-88).

22. Q: **Do you admit or deny that on or about December 28, 1997, you had a discussion with Monica Lewinsky at the White House regarding her moving to New York?**

22. R: The record indicates that the President had such a discussion with Monica Lewinsky at the White House:

"On December 28, 1997, Lewinsky visited the President at the White House. . . .Lewinsky and the President discussed her move to New York. . . ." (7/ 27/98 OIC Interview of Monica Lewinsky, p. 7, H. Doc. 105-311, p. 1395).

23. Q: **Do you admit or deny that on or about December 28, 1997, you had a discussion with Monica Lewinsky at the White House in which you suggested to her that she move to New York soon because by moving to New York, the lawyers representing Paula Jones in the case of *Jones v. Clinton* may not contact her?**

23. R: The record indicates that the President had such a discussion with Monica Lewinsky at the White House and made such a suggestion:

"On December 28, 1997, Lewinsky visited the President at the White House. . . .the

President said that if Lewinsky was in New York the Jones lawyers might not call; that the sooner Lewinsky moved the better; and that maybe the lawyers would ignore her.” (7/27/98 OIC Interview of Monica Lewinsky, p. 7, H. Doc. 105-311, p. 1395).

24. Q: **Do you admit or deny that on or about December 28, 1997, you had a discussion with Monica Lewinsky at the White House regarding gifts you had given to Ms. Lewinsky that were subpoenaed in the case of *Jones v. Clinton*?**

24. R: The record indicates that the President had such a discussion with Monica Lewinsky:

A We -- we really spent maybe about five -- no more than ten minutes talking about the Paula Jones case on [December 28] . . . I brought up the subject of the case because I was concerned about how I had been brought into the case and been put on the witness list. . . .And then at some point I said to him, ‘Well, you know, I – maybe I should put the gifts away outside my house somewhere or give them to someone, maybe Betty.’ And he sort of said – I think he responded, ‘I don’t know’ or ‘Let me think about that.’ And left that topic.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 152, H. Doc. 105-311, p. 872; See also 7/27/98 OIC Interview of Monica Lewinsky, p. 7, H. Doc. 105-311, p. 1395).

25. Q: **Do you admit or deny that on or about December 28, 1997, you expressed concern to Monica Lewinsky about a hatpin you had given to her as a gift which had been subpoenaed in the case of *Jones v. Clinton*?**

25. R: The record indicates that the President expressed such concern:

“I mentioned that I had been concerned about the hat pin being on the subpoena and he said that had sort of concerned him also.” (Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 152, H. Doc. 105-311, p. 872; See also 7/27/98 OIC Interview of Monica Lewinsky, p. 7, H. Doc. 105-311, p. 1395).

26. Q: **Do you admit or deny that on or about December 28, 1997, you discussed with Betty Currie gifts previously given by you to Monica Lewinsky?**

26. R: The record indicates that such a discussion occurred. Monica Lewinsky testified under oath before the grand jury that a few hours after meeting with the President on December 28, 1997, a meeting in which Ms. Lewinsky and President Clinton discussed the fact that gifts given to her by Mr. Clinton had been subpoenaed in the case of *Jones v. Clinton*, Betty Currie called her:

“Q What did [Betty Currie] say?

A She said, “I understand you have something to give me.” Or, “The President said you have something to give me.” Along those lines. . . .

Q When she said something along the lines of “I understand you have something to give me,” or “The President says you have something for me,” what did you understand her to mean?

A The gifts.”

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, pp. 154-55, H. Doc. 105-311, pp. 874-75).

In Monica Lewinsky's February 1, 1998 handwritten statement to the OIC, which Ms. Lewinsky has testified is truthful, she stated, “Ms. Currie called Ms. L later that afternoon and said that the Pres. had told her Ms. L wanted her to hold onto something for her. Ms. L boxed up most of the gifts she had received and gave them to Ms. Currie.” (2/1/98 Handwritten Proffer of Monica Lewinsky, p. 7, H. Doc. 105-311, p. 715).

Betty Currie testified that she did not recall the President telling her that Ms. Lewinsky wanted her to hold some items. When asked if a contrary statement by Ms. Lewinsky--indicating that Ms. Currie had in fact spoken to the President about the gift transfer--would be false, Ms. Currie replied: “She may remember better than I. I don't remember.” (Grand Jury Testimony of Betty Currie, 5/6/98, p. 126, H. Doc. 105-316, p. 584).

President Clinton testified about this subject before the grand jury on August 17, 1998:

“Q After you gave her the gifts on December 28, 1997, did you speak with you secretary, Ms. Currie, and ask her to pick up a box of gifts that were some compilation of gifts that Ms. Lewinsky would have----

A No, sir, I didn't do that.

Q ----to give to Ms. Currie?

A I did not do that.

(Grand Jury Testimony of President Clinton, 8/17/98, p. 51, H. Doc. 105-311, p. 638).

27. Q: **Do you admit or deny that on or about December 28, 1998 [sic], you requested, instructed, suggested to or otherwise discussed with Betty Currie that she take possession of gifts previously given to Monica Lewinsky by you?**

27. R: See Request for Admission No. 24 (H. Doc. 105-311, p. 872). See also Currie quote as set forth in Request for Admission No. 26 (H. Doc. 105-316, p. 584).

28. Q: **Do you admit or deny that you had a telephone conversation on January 6,**

1998, with Vernon Jordan during which you discussed Monica Lewinsky's affidavit, yet to be filed, in the case of *Jones v. Clinton*?

28. R: The record indicates that such a conversation may have occurred. See Telephone Calls, Table 35, included in Appendix G as referenced in note 928, H. Doc. 105-310, p. 108 (Vernon Jordan telephones the President less than 30 minutes after speaking with Monica Lewinsky over the telephone about her draft affidavit).

29. Q: **Do you admit or deny that you had knowledge of the fact that Monica Lewinsky executed for filing an affidavit in the case of *Jones v. Clinton* on January 7, 1998?**

29. R: The record indicates that the President had such knowledge:

Q "... [Y]ou conveyed ... both to Betty Currie and to the President – namely, that you knew Ms. Lewinsky had signed the affidavit [on January 7, 1998]?"

A "Right."

(Grand Jury testimony of Vernon Jordan, 5/5/98, p. 223, H. Doc. 105-316, p. 1828)

"I believe that he [Vernon Jordan] did notify us, I think, when she signed her affidavit. I have a memory of that." (Grand Jury Testimony of President Clinton, 8/17/98, p. 73, H. Doc. 105-311, p. 525).

30. Q: **Do you admit or deny that on or about January 7, 1998, you had a discussion with Vernon Jordan in which he mentioned that Monica Lewinsky executed for filing an affidavit in the case of *Jones v. Clinton*?**

30. R: The record indicates that such a discussion occurred:

"Q Okay, do you believe that it would have been during one of these calls [phone conversations between the President and Vernon Jordan on January 7, 1998] that you would have indicated to the President that Ms. Lewinsky had, in fact, signed the affidavit?"

A That, too, is a reasonable assumption."

(Grand Jury Testimony of Vernon Jordan, 5/5/98, p. 224, H. Doc. 105-316, p. 1828).

31. Q: **Do you admit or deny that on or about January 7, 1998, you had a discussion with Vernon Jordan in which he mentioned that he was assisting Monica Lewinsky in finding a job in New York?**

31. R: The record indicates that such a discussion occurred:

"I'm sure I said, 'I'm still working on her job [in New York]'. To which Jordan quotes the President as responding, "Good." (Grand Jury Testimony of Vernon Jordan, 5/5/98, p. 226, H. Doc. 105-316, p. 1829).

32. Q: **Do you admit or deny that you viewed a copy of the affidavit executed by Monica Lewinsky on January 7, 1998, in the case of *Jones v. Clinton*, prior to your deposition in that case?**

32. R: The record indicates that the President was fully aware of the contents of the affidavit of Monica Lewinsky prior to his deposition on January 17, 1998:

During the January 17, 1998 deposition of President Clinton in the case of *Jones v. Clinton*, Robert Bennett, President Clinton's attorney, after describing part of Monica Lewinsky's affidavit, stated, "I am not coaching the witness. In preparation of the witness for this deposition, the witness is fully aware of Ms. Jane Doe 6's affidavit, so I have not told him a single thing he doesn't know..." (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 54).

The testimony of Vernon Jordan also indicates that the President had knowledge of the affidavit:

"Q ... [I]s it accurate that based on the conversations you had with [the President] already, you didn't have to explain to him [on January 7, 1998] what the affidavit was?

A I think that's a reasonable assumption."
(Grand Jury testimony of Vernon Jordan, 5/5/98, p. 225, H. Doc. 105-316, p. 1828)

33. Q: **Do you admit or deny that you had knowledge that your counsel viewed a copy of the affidavit executed by Monica Lewinsky on January 7, 1998, in the case of *Jones v. Clinton*, prior to your deposition in that case?**

33. R: The record indicates that the President's counsel viewed a copy of the affidavit and briefed the President. Frank Carter, Monica Lewinsky's former attorney, testified before the grand jury that he provided a copy of Monica Lewinsky's affidavit to Robert Bennett, President Clinton's attorney:

"Q Did Monica ask you if she had shown or discussed the affidavit with either Vernon Jordan or Bennett before she signed it?

A I'm not sure. I'm not sure . . . Bob Bennett did not see this until--I believe Bob Bennett did not see this until the 15th of January when I sent him a copy."(Grand Jury Testimony of Frank Carter, 6/18/98, pp.112-13, H. Doc. 105-316, pp. 420-21).

During the January 18, 1998 deposition of President Clinton in the case of *Jones v.*

Clinton, Robert Bennett, President Clinton's attorney, after describing part of Monica Lewinsky's affidavit, stated, "I am not coaching the witness. In preparation of the witness for this deposition, the witness is fully aware of Ms. Jane Doe 6's affidavit, so I have not told him a single thing he doesn't know..." (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 54 (as released in public sources)).

34. **Q: Do you admit or deny that you had knowledge that any facts or assertions contained in the affidavit executed by Monica Lewinsky on January 7, 1998, in the case of *Jones v. Clinton* were not true?**

34. R: The record indicates that the President had such knowledge. In the affidavit executed in the case of *Jones v. Clinton*, Monica Lewinsky asserted the following:

"I have never had a sexual relationship with the President, he did not propose that we have 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." (Affidavit of Jane Doe # 6, para. 8, H. Doc. 105-311, pp. 1235-36.)

During the January 17, 1998 deposition of President Clinton in the case of *Jones v. Clinton*, Robert Bennett, President Clinton's attorney, stated "Counsel is fully aware that Ms. Jane Doe #6 has filed, has an affidavit which they are in possession of saying that there is absolutely no sex of any kind in any manner, shape of form, with President Clinton. . . ." (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 54 (as released in public sources)).

The Grand Jury Testimony of Monica Lewinsky, given under oath and following a grant of transactional immunity, confirmed that the contents of her affidavit were not true:

"Q Paragraph 8 . . . [of the affidavit] says, 'I have never had a sexual relationship with the President.' Is that true?

A No."

(Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 204, H. Doc. 105-311, p. 924).

35. **Q: Do you admit or deny that you viewed a copy of the affidavit executed by Monica Lewinsky on January 7, 1998, in the case of *Jones v. Clinton*, at your deposition in that case on January 17, 1998?**

35. R: The record indicates that the President was present when his attorney, Robert Bennett, read from the affidavit executed by Monica Lewinsky. (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 204 (as released in

public sources)).

36. Q: **Do you admit or deny that you had knowledge that your counsel viewed a copy of the affidavit executed by Monica Lewinsky on January 7, 1998, in the case of *Jones v. Clinton*, at your deposition in that case on January 17, 1998?**

36. R: The record indicates that the President had such knowledge. During the January 17, 1998 deposition of President Clinton in the case of *Jones v. Clinton*, Robert Bennett, the President's attorney, recited portions of the affidavit Monica Lewinsky had executed in the case of *Jones v. Clinton*. The President was present when the affidavit was read. (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 204 (as released in public sources)).

37. Q: **Do you admit or deny that on or about January 9, 1998, you received a message from Vernon Jordan indicating that Monica Lewinsky had received a job offer in New York?**

37. R: The record indicates that President received such a message:

“As I recollect, I said Monica Lewinsky’s going to work for Revlon and his response was thank you very much.” (Grand Jury Testimony of Vernon Jordan, 5/28/98, p. 59, H. Doc. 105-316, p. 1903).

38. Q: **Do you admit or deny that between January 9, 1998, and January 15, 1998, you had a conversation with Erskine Bowles in the Oval Office in which you stated that Monica Lewinsky received a job offer and had listed John Hilley as a reference?**

38. R: The record indicates that such a conversation occurred:

“[S]he [Monica Lewinsky] had found a job in the private sector, and that she had listed John Hilley as a reference, and could we see if he could recommend her, if asked.” (Grand Jury Testimony of Erskine Bowles, 4/2/98, p. 78, H. Doc. 105-316, p. 238).

39. Q: **Do you admit or deny that you asked Erskine Bowles if he would ask John Hilley to give Ms. Lewinsky a positive job recommendation?**

39. R: The record indicates that the President asked Erskine Bowles if he would ask Mr. Hilley to give Monica Lewinsky a positive job recommendation. See Request for Admission No. 38 (H. Doc. 105-316, p. 238).

40. Q: **Do you admit or deny that during your deposition in the case of *Jones v. Clinton* on January 17, 1998, you affirmed that the facts or assertions stated in the**

affidavit executed by Monica Lewinsky on January 7, 1998, were true?

40. R: The record indicates that the President, under oath, affirmed that the assertions made in Monica Lewinsky's affidavit were true, even though he knew they were false. During the January 17, 1998 deposition of President Clinton in the case of *Jones v. Clinton*, Robert Bennett, the President's attorney, read parts of the affidavit Monica Lewinsky had executed in the case of *Jones v. Clinton*. At one point Mr. Bennett read part of paragraph eight of Monica Lewinsky's affidavit, in which Monica Lewinsky asserts, "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 reflecting a sexual relationship."

After reading from the affidavit out loud, Mr. Bennett asked the President: "Is that a true and accurate statement as far as you know it?" The President answered, "That is absolutely true." (Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 204 (as released in public sources)).

41. Q: **As to each, do you admit or deny that you gave the following gifts to Monica Lewinsky at any time in the past?**

1. A lithograph
2. A hatpin
3. A large "Black Dog" canvas bag
4. A large "Rockettes" blanket
5. A pin of the New York skyline
6. A box of "cherry chocolates"
7. A pair of novelty sunglasses
8. A stuffed animal from the "Black Dog"
9. A marble bear's head
10. A London pin
11. A shamrock pin
12. An Annie Lennox compact disc
13. Davidoff cigars

41. R: The record indicates that the President did present each of these items as gifts to Monica Lewinsky.

A chart prepared as part of her testimony before the Grand Jury details Monica Lewinsky's visits to the President and the exchange of gifts during those visits is contained in H. Doc. 105-311, pp. 1251-61.

42. Q: **Do you admit or deny that when asked on January 17, 1998, in your deposition in the case of *Jones v. Clinton* if you had ever given gifts to Monica Lewinsky, you stated that you did not recall, even though you actually had knowledge of giving her gifts in addition to gifts from the "Black Dog?"**

42. R: The record indicates that the President stated that he did not recall even though he had knowledge:

“Q Well, have you ever given any gifts to Monica Lewinsky?”

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

Q A hat pin?

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

(Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 75 (as released in public sources). See also request for admission number 41 for evidence of numerous gifts Mr. Clinton gave to Ms. Lewinsky.)

Furthermore, the evidence shows that President Clinton and Monica Lewinsky discussed the hat pin gift on December 28, 1997, after Ms. Lewinsky received a subpoena calling for her to produce all gifts she received from Mr. Clinton, including any hat pins. Ms. Lewinsky stated under oath before the grand jury that “I mentioned that I had been concerned about the hat pin being on the subpoena and he said that that had sort of concerned him also and asked me if I had told anyone that he had given me the hat pin and I said no.” (Grand Jury Testimony of Monica Lewinsky, 8/6/98, p. 152, H. Doc. 105-311, p. 1000).

43. Q: **Do you admit or deny that you gave false and misleading testimony under oath in your deposition in the case of *Jones v. Clinton* when you responded “once or twice” to the question “has Monica Lewinsky ever given you any gifts?”**

43. R: The record indicates that the President gave such false and misleading testimony:

“Q Has Monica Lewinsky ever given you any gifts?”

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

(Deposition of President Clinton in the case of *Jones v. Clinton*, 1/17/98, p. 76 (as released in public sources)).

The evidence shows that Ms. Lewinsky gave the President approximately 38 gifts presented on numerous occasions. (See chart in House Document 105-311 pp. 1251-61.)

44. Q: **Do you admit or deny that on January 17, 1998, at or about 5:38 p.m., after the conclusion of your deposition in the case of *Jones v. Clinton*, you telephoned Vernon Jordan at his home?**

44. R: The record indicates that such a telephone call was made. See Telephone Table 46, Call 2, as referenced in 5/28/98 Grand Jury Testimony of Vernon Jordan, pp. 94-95, as cited in Note

1022, H. Doc. 105-310, p. 118.

45. Q: **Do you admit or deny that on January 17, 1998, at or about 7:02 p.m., after the conclusion of your deposition in the case of *Jones v. Clinton*, you telephoned Betty Currie at her home?**

45. R: The record indicates that such a telephone call was made. See Telephone Table 46, Call 4, as referenced in 1/27/98 Grand Jury testimony of Betty Currie, pp. 65-66, and all that follows, as cited in Note 1021, H. Doc. 105-310, p. 118.

46. Q: **Do you admit or deny that on January 17, 1998, at or about 7:02 p.m., after the conclusion of your deposition in the case of *Jones v. Clinton*, you telephoned Vernon Jordan at his office?**

46. R: The record indicates that such a telephone call was made. See Request for Admission No. 44, referencing the “second conversation” between Mr. Jordan and the President, as noted on p. 95 of the 5/28/98 Grand Jury testimony of Vernon Jordan, H. Doc. 105-316, p. 1912.

47. Q: **Do you admit or deny that on January 17, 1998, at or about 7:13 p.m., after the conclusion of your deposition in the case of *Jones v. Clinton*, you telephoned Betty Currie at her home and asked her to meet with you the next day, Sunday, January 18, 1998?**

47. R: The record indicates that such a telephone conversation occurred:

“The best that I can remember of a call, the President called, just said that he wanted to talk to me. And I said, ‘Fine.’ He said, ‘Could you come in on Sunday?’ And I said, ‘Fine.’” (Grand Jury Testimony of Betty Currie, 1/27/98, p. 66, H. Doc. 105-316, p. 558; For corroborative evidence, including phone log references, see Note 1021, H. Doc. 105-310, p. 118.)

48. Q: **Do you admit or deny that on January 18, 1998, at or about 6:11 a.m., you learned of the existence of tapes of conversations between Monica Lewinsky and Linda Tripp recorded by Linda Tripp?**

48. R: The record indicates that the President learned of the existence of the tapes early in the morning. The “Drudge Report”, which discussed the tapes, was available on the Internet at 6:11 a.m.

“Q Mr. President, when did you learn about the Drudge Report reporting allegations of you having a sexual relationship with someone at the White House?

A I believe it was the morning of the 18th, I think . . .

Q Very early morning hours, sir?

A . . . yeah, I think it was when I got up Sunday morning, I think. Maybe it was late Saturday night. I don't remember."

(Grand Jury Testimony of President Clinton, 8/17/98, pp. 142-43, H. Doc. 105-311, pp. 594-95).

This was confirmed by Vernon Jordan during his testimony about a meeting he had with the President on January 19, 1998:

"A . . . He obviously knew about the Drudge Report, it did not require any lengthy discussion.

Q Well, when you say he obviously knew about the Drudge Report, how do you know he knew about the Drudge Report?

A He acknowledged in some way that he knew about the Drudge Report and I think it's fair to say he was as surprised at this Drudge Report that reported that there had been these taped conversations with this person named Linda Tripp."

(Grand Jury Testimony of Vernon Jordan, 3/5/98, p. 126, H. Doc. 105-316, p. 1764.)

49. Q: **Do you admit or deny that on January 18, 1998, at or about 12:50 p.m., you telephoned Vernon Jordan at his home?**

49. R: The record indicates that such a telephone call was made. See Telephone Table 47, Call 2, as referenced on p. 174 of H. Doc. 105-311.

50. Q: **Do you admit or deny that on January 18, 1998, at or about 1:11 p.m., you telephoned Betty Currie at her home?**

50. R: The record indicates that such a telephone call was made. See Telephone Table 47, Call 3, as referenced on p. 174 of H. Doc. 105-311.

51. Q: **Do you admit or deny that on January 18, 1998, at or about 2:55 p.m., you received a telephone call from Vernon Jordan?**

51. R: The record indicates that such a telephone call was made. See Telephone Table 47, Call 5, as referenced on p. 174 of H. Doc. 105-311.

52. Q: **Do you admit or deny that on January 18, 1998, at or about 5:00 p.m., you had a meeting with Betty Currie at which you made statements similar to any of the following regarding your relationship with Monica Lewinsky?**

1. "You were always there when she was there, right? We were never really alone."
2. "You could see and hear everything."
3. "Monica came on to me, and I never touched her right?"
4. "She wanted to have sex with me and I couldn't do that."

52. R: The record indicates that the President made statements similar to these to Betty Currie on January 18, 1998 at a meeting held around 5:00 p.m.:

“Q Is that what you remember him saying?

A Could you do the second point again – the video –

Q Okay. The second – the videotape –

A She was over at the White House, and then she was alone.

Q Right. That those were among the issues the President brought to your attention when he initially came to your desk?

A The best I remember it, yes, sir.

Q Okay. And then you told us that the President began to ask you a series of questions that were more like statements than questions.

A Right.

Q And you were nodding your head correct; is that right?

A That’s correct, sir.

Q Okay. So the President asked you or made a series of statements to you; is that correct?

A That’s correct, sir.

Q Okay. Do you remember what the statements were?

A The best I can remember sir – and it’s getting worse by the minutes, seems like – “Monica was never – You were always there when Monica was there. We were never really alone.” Those two stick in my mind as two statements he made.

Q Let me see if I can refresh your recollection as to some others.

A Yes.

Q Did the President also make the statement: ‘Monica came on to me, and I never touched her, right’?

A Yes, that statement was made, sir.

Q Did the President also state to you at that time: 'She wanted to have sex with me, and I can't do that, right'?

A I don't remember the 'right' part coming after there but – probably without the right.”

Q Okay.

A Or I don't--but that--just that that statement was made, yes, sir.

Q Okay. And did the President also say to you, 'You could see and hear everything?'

A Correct.

Q You indicated that the President may not have added the 'right' at the end. But would it be fair to say that the way the President was posing these statements to you, that he wanted you to agree with them?

A Not on that one.

Q Not on the 'She wanted to have sex with me, and I can't do that'?

A 'I told her I couldn't do that' or something like that. So it wasn't one that I – I may have been saying 'right,' but I don't think he – I don't – the best that I remember on that one, "She wanted to have sex with me, but I can't – I told her I couldn't do that.'

Q And that one, he didn't necessarily want you to agree with – it is that what your testimony is – that it was just a statement?

A That – I would call it a statement, sir.

Q But the way the other statements were posed to you – and I'll read them again. The way the other statements were posed to you – is it correct that the way they were posed, the President wished you to agree with them? And I'll read them back to you.

A The President wished me to agree with them?

Q Yes.

A Read them again.

Q You were always there when she was there.

A (Nodding.) Right.

Q Okay. Is 'right' meaning, correct, he wanted – the President wanted you to agree with

that?

A Oh, because I said 'right' – I was always there. Since I can't say what he wanted – but my impression was that he was just making statements.

Q You added a 'right' to the last statement that I –

A Which one was that?

Q The 'You were always there when she was there, right?' Is that the way you remember the President stating it to you?

A That's how I remember him stating it to me.

Q Would it be fair to say, then – based on the way he stated it and the demeanor that he was using at the time that he stated it to you – that he wished you to agree with that statement?

A I can't speak for him, but –

Q How did you take it? Because you told us at these meetings in the last several days that that is how you took it.

A (Nodding.)

Q And you're nodding your head 'Yes', is that correct?

A That's correct.

Q Okay. With regard to the statement that the President made to you, 'You remember I was never really alone with Monica, right?' – was that also a statement that, as far as you took, that he wished you to agree with that?

A Correct.

Q And to the President's statement to you: 'You could see and hear everything, right?' – was that also a statement that the president, as far as you could tell, wished you to agree to?

A Not only did he wish me to agree to it, but they were also right. But right.

Q What do you mean they were also right?

A I was always there. I could always hear. And the last one –

Q Okay. You could not hear the President –

A Well, read that question.

Q You could –

A I was always there.

Q Well, the last one was: ‘You could see and hear everything.’ That is not correct, is it?

A I could not see and hear everything, no.

Q Okay. Now, there was a first one: ‘You were there when I was–’

A ‘ – when she was there.’

Q ‘ – when she was there.’

A And that’s – to my knowing, that’s correct.

Q Well, but you’ve already testified that there were several occasions when the President and Ms. Lewinsky were in the Oval Office when you were not there in –

A But if she was there, I was there. She was not – to my knowing, she didn’t come to see him or come there, and I wasn’t there.

Q You mean that she was always – you were always there when Ms. Lewinsky came to visit him.

A Mm-hmm.

Q You were always in the general area.

A Correct.

Q Okay. You also told us in the last couple days when we discussed this matter with the President, that he appeared to you – when he was going through these statements and talking about what occurred in the deposition, that he appeared to be concerned.

A Appeared to be concerned, yes.

Q Okay. Let’s move on –

A Thank you.

Q – to the next – the following days. You left the White House after this discussion with the President; is that correct?

A (Nodding.)

Q When was the next time you heard from him, approximately?

A I was reminded that Monday was a holiday.

Q Martin Luther King's birthday."

(Grand Jury Testimony of Betty Currie, 1/27/98, pp. 71-76, H. Doc. 105-316, pp. 559-60).

53. Q: **Do you admit or deny that you had a conversation with Betty Currie within several days of January 18, 1998, in which you made statements similar to any of the following regarding your relationship with Monica Lewinsky?**

1. "You were always there when she was there, right? "We were never really alone."

2. "You could see and hear everything."

3. "Monica came on to me, and I never touched her right?"

4. "She wanted to have sex with me and I couldn't do that."

53. R: The record indicates that the President made statements similar to these to Betty Currie within several days of January 18, 1998:

"... [W]hen he called me in the Oval Office, it was sort of a recapitulation of what we had talked about on Sunday...." (Grand Jury Testimony of Betty Currie, 1/27/98, p. 81, H. Doc. 105-316, p. 561).

54. Q: **Do you admit or deny that on January 18, 1998, at or about 11:02 p.m., you telephoned Betty Currie at her home?**

54. R: The record indicates that such a telephone call was made. See Telephone Table 47, Call 11, as referenced on p. 174 of H. Doc. 105-311.

55. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 8:50 a.m., you telephoned Betty Currie at her home?**

55. R: The record indicates that such a telephone call was made. See Telephone Table 48, Call 8, as referenced on p. 176 of H. Doc. 105-311.

56. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 8:56 a.m., you telephoned Vernon Jordan at his home?**

56. R: The record indicates that such a telephone call was made. See Telephone Table 48, Call 10, as referenced on p. 176 of H. Doc. 105-311.

57. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 10:58 a.m., you telephoned Vernon Jordan at his office?**

57. R: The record indicates that such a telephone call was made. See Telephone Table 48, Call 16, as referenced on p. 177 of H. Doc. 105-311.

58. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 1:45 p.m., you telephoned Betty Currie at her home?**

58. R: The record indicates that such a telephone call was made. See Telephone Table 48, Call 21, as referenced on p. 177 of H. Doc. 105-311.

59. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 2:44 p.m., you met with individuals including Vernon Jordan, Erskine Bowles, Bruce Lindsey, Cheryl Mills, Charles Ruff, and Rahm Emanuel?**

59. R: The record indicates that Vernon Jordan entered the White House at 2:44 p.m. on January 19, 1998 (H. Doc. 105-316, p. 1995). Vernon Jordan's Grand Jury Testimony reveals that he and the President had a meeting at that time. (Grand Jury Testimony of Vernon Jordan, 3/5/98, p. 124, H. Doc. 105-316, p. 1763).

60. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 2:44 p.m., at any meeting with Vernon Jordan, Erskine Bowles, Bruce Lindsey, Cheryl Mills, Charles Ruff, Rahm Emanuel, and others, you discussed the existence of tapes of conversations between Monica Lewinsky and Linda Tripp recorded by Linda Tripp, or any other matter relating to Monica Lewinsky?**

60. R: The record indicates that Vernon Jordan entered the White House at 2:44 p.m. on January 19, 1998 (H. Doc. 105-316, p. 1995). The President met with Vernon Jordan shortly thereafter and they discussed the existence of the Tripp tapes:

"Q Now, with as much specificity as you can, what would you have told him about the Drudge Report?

A That I had seen the Drudge Report. He obviously knew about the Drudge Report, it did not require any lengthy discussion.

Q Well, when you say he obviously knew about the Drudge Report, how do you know he knew about the Drudge Report?

A He acknowledged in some way that he knew about the Drudge Report and I think it's fair to say he was as surprised at this Drudge Report that reported that there had been these taped conversations with this person named Linda Tripp."
(Grand Jury Testimony of Vernon Jordan, 3/5/98, p. 126, H. Doc. 105-316, p. 1764).

61. Q: **Do you admit or deny that on Monday, January 19, 1998, at or about 5:56 p.m., you telephoned Vernon Jordan at his office?**

61. R: The record indicates that such a telephone call was made. See Presidential Call Log, H. Doc. 105-311, p. 2882.

62. Q: **Do you admit or deny that on January 21, 1998, the day the Monica Lewinsky story appeared for the first time in the *Washington Post*, you had a conversation with Sidney Blumenthal, in which you stated that you rebuffed alleged advances from Monica Lewinsky and in which you made a statement similar to the following?: “Monica Lewinsky came at me and made a sexual demand on me.”**

62. R: The record indicates that such a conversation occurred. Testifying before the grand jury on June 4, 1998, Sidney Blumenthal, an Assistant to the President, related the following discussion he had with the President on January 21, 1998:

He said Dick Morris had called him that day and he said Dick had told him that Nixon---he had read the newspaper and he said “You know, Nixon could have survived if he had gone on television and given an address and said everything he had done wrong and got it all out in the beginning.”

And I said to the President, “What have you done wrong?” And he said, “Nothing, I haven't done anything wrong.” I said, “Well then, that's one of the stupidest things I've ever heard. Why would you do that if you've done nothing wrong?”

And it was at that point that he gave his account of what had happened to me and he said that Monica-and it came very fast. He said, “Monica Lewinsky came at me and made a sexual demand on me.” He rebuffed her. He said, I've gone down that road before, I've caused pain for a lot of people and I'm not going to do that again.” (Grand Jury Testimony of Sidney Blumenthal, 6-4-98, p. 49, H. Doc.105-316, p.185).

63. Q: **Do you admit or deny that on January 21, 1998, the day the Monica Lewinsky story appeared for the first time in the *Washington Post*, you had a conversation with Sidney Blumenthal, in which you made a statement similar to the following in response to a question about your conduct with Monica Lewinsky?: “I haven't done anything wrong.”**

63. R: The record indicates that such a conversation occurred. See Blumenthal testimony in request for admission number 62.

64. Q: **Do you admit or deny that on January 21, 1998, the day the Monica Lewinsky story appeared for the first time in the *Washington Post*, you had a conversation with Erskine Bowles, Sylvia Matthews and John Podesta, in which you made a statement similar to the following?: “I want you to know I did not have sexual relationships with this woman Monica Lewinsky. I did not ask anybody to lie. And when the facts come out, you'll understand.”**

64. R: The record indicates that such a conversation occurred. In his grand jury testimony on June 16, 1998, then White House Deputy Chief of Staff John Podesta (now Chief Of Staff) testified to the following regarding a January 21, 1998 meeting with President Clinton:

“A And we went in to see the President.

Q Who's we?

A Mr. Bowles, myself and Ms. Matthews.

Q Okay. Tell us about that.

A And we started off the meeting-we didn't-I don't think we said anything, and I think the President directed this specifically to Mr. Bowles. He said, "Erskine, I want you to know that this story is not true.

Q What else did he say?

A He said that-that he had not had a sexual relationship with her, and that he never asked anybody to lie.”

(Grand Jury Testimony of John Podesta, 6/16/98, p. 85, H. Doc.105-316, p. 3310).

Erskine Bowles had the following recollection of the same meeting:

“A And this was the day this huge story breaks. And the three of us walk in together-Sylvia Matthews, John Podesta and me-into the oval office, and the President was standing behind his desk.

Q About what time of day is this?

A This is approximately 9:00 in the morning or something---you know, in that area. And he looked up at us and he said the same thing he said to the American people. He said, I want you to know I did not have sexual relationships with this woman Monica Lewinsky. I did not ask anybody to lie. And when the facts come out, you'll understand.”

(Grand Jury Testimony of Erskine Bowles, 4/2/98, pp. 83-84, H. Doc. 105-316, p. 239).

65. Q: **Do you admit or deny that on or about January 23, 1998, you had a conversation with John Podesta, in which you stated that you had never had an affair with Monica Lewinsky?**

65. R: The record indicates that on January 23, 1998, President Clinton told John Podesta that he had never had sex with Monica Lewinsky in any way whatsoever:

“A See, we were getting ready to do the State of the Union prep and he was working on the state of the union draft back in his study. I went back there to just to kind of get him

going-this is the first thing in the morning-you know, we sort of get engaged. I asked him how he was doing, and he said he was working on this draft, and he said to me that he had never had sex with her, and that-he never asked-you know, he repeated the denial, but he was extremely explicit in saying he never had sex with her.

Q How do you mean?

A Just what I said.

Q Okay. Not explicit, in the sense that he got more specific than sex, than the word "sex."

A Yes, he was more specific than that.

Q Okay. Share that with us.

A Well, I think he said-he said that-there was some spate of, you know, what sex acts were counted, and he said that he had never had sex with her in any way whatsoever-

Q Okay.

A --that they had not had oral sex.

Q No question in your mind he's denying any sex in any way, shape or form, correct?

A That's correct."

(Grand Jury Testimony of John Podesta, 6/16/98, pp. 91-3, H. Doc. 105-316, p. 3311).

66. Q: **Do you admit or deny that on or about January 23, 1998, you had a conversation with John Podesta, in which you stated that you were not alone with Monica Lewinsky in the Oval Office, and that Betty Currie was either in your presence or outside your office with the door open while you were visiting with Monica Lewinsky?**

66. R: The record indicates that such a conversation occurred:

"Q Did the President ever speak to that issue with you, the issue of if he didn't have an improper relationship with Ms. Lewinsky, what was she doing there so often? Did he ever speak to that?

A He said to me-I don't think it was in this conversation, I think it was a couple weeks later. He said to me that after she left, that when she had come by, she came to see Betty, and that he-when she was there, either Betty was with them-either that she was with Betty when he saw her or that he saw her in the Oval Office with the door open and Betty was around-and Betty was out at her desk."

(Grand Jury Testimony of John Podesta, 6/16/98, p.88, H. Doc. 105-316, p. 3310).

67. Q: **Do you admit or deny that on or about January 26, 1998, you had a conversation with Harold Ickes, in which you made statements to the effect that you did not have an affair with Monica Lewinsky?**

67. R: The record indicates that such a conversation occurred. Harold Ickes, a former Deputy Chief of Staff at the White House testified before the grand jury that the President Clinton told him that he had not had a sexual relationship with Monica Lewinsky:

“Q What did the President say about Monica Lewinsky?

A The only discussion I recall having with him, he denied that he had had sexual relations with Ms. Lewinsky and denied that he had-I don't know how to capsulize it-obstructed justice, let's use that phrase.

(Grand Jury Testimony of Harold Ickes, 6/10/98, p. 21, H. Doc. 105-316, p. 1487; See also Grand Jury Testimony of Harold Ickes from 8/5/98, p. 88, H. Doc.105-316, p.1610 (“He denied to me that he had had a sexual relationship. I don't know the exact phrase, but the word 'sexual' was there. And he denied any obstruction of justice”)).

68. Q: **Do you admit or deny that on or about January 26, 1998, you had a conversation with Harold Ickes, in which you made statements to the effect that you had not asked anyone to change their story, suborn perjury or obstruct justice if called to testify or otherwise respond to a request for information from the Office of Independent Counsel or in any other legal proceeding?**

68. R: The record indicates that such a conversation occurred. Harold Ickes testified before the grand jury that: “The two things I recall, the two things that he again repeated in public-had already said publicly and repeated in public that same Monday morning was that he had not-he did not have a--or he had not had a sexual relationship with Ms. Lewinsky and that he had done nothing--now I'm paraphrasing-had done nothing to ask anybody to change their story or suborn perjury or obstruct justice.”

(Grand Jury Testimony of Harold Ickes, 6/10/98, p. 73, H. Doc. 105-316, p. 1539).

During his testimony before the grand jury, President Clinton admitted he made "misleading" statements to aides whom he knew were likely to be called to testify before the grand jury. The President testified as follows:

“Q Do you recall denying any sexual relationship with Monica Lewinsky to the following people: Harry Thomasson, Erskine Bowles, Harold Ickes, Mr. Podesta, Mr. Blumenthal, Mr. Jordan, Ms. Betty Currie? Do you recall denying any sexual relationship with Monica Lewinsky to these individuals?

A I recall telling a number of those people that I didn't have, either I didn't have an affair with Monica Lewinsky or didn't have sex with her. And I believe sir, that-you'll have to ask them what they thought. But I was using those terms in the normal way people use them. You'll have to ask them what they thought I was saying.

Q You knew that they might be called into a grand jury, didn't you?

A That's right."

(Grand Jury Testimony of William Jefferson Clinton, 8/17/98, pp. 105-107, H. Doc.105-311, p. 647).

69. Q: **Do you admit or deny that, on or about January 21, 1998, you and Richard "Dick" Morris discussed the possibility of commissioning a poll to determine public opinion following the *Washington Post* story regarding the Monica Lewinsky matter?**

69. R: The record indicates that such a discussion occurred. Richard "Dick" Morris testified before the Grand Jury that during a conversation with the President the same day the Washington Post published a story concerning Monica Lewinsky, Mr. Morris suggested a public poll to test public opinion about the story. President Clinton asked Mr. Morris "When can you do it?", Mr. Morris replied "Tonight." and President Clinton requested Mr. Morris to "Call me tonight with the numbers." (Grand Jury Testimony of Richard Morris, 8/18/98, p. 17, H. Doc. 105-316, p. 2927).

70. Q: **Do you admit or deny that you had a later conversation with Richard "Dick" Morris in which he stated that the polling results regarding the Monica Lewinsky matter suggested that the American people would forgive you for adultery but not for perjury or obstruction of justice?**

70. R: The record indicates that such a conversation occurred. Richard "Dick" Morris testified before the Grand Jury that he explained the results of a public opinion poll to President Clinton. Mr. Morris testified, "They're just too shocked by this. It's just too new, it's too raw. And the problem is they're willing to forgive you for adultery, but not for perjury or obstruction of justice or the various other things. They're even willing to forgive the conduct. They're not willing to forgive the word. In other words, if in fact you told Monica Lewinsky to lie, they can forgive that, but if you committed subornation of perjury, they won't." (Grand Jury Testimony of Richard Morris, 8/18/98, pp. 28, 29, H. Doc.105-316, pp. 2929, 2930).

71. Q: **Do you admit or deny that you responded to Richard "Dick" Morris's explanation of these polling results by making a statement similar to the following: "[w]ell, we just have to win, then" ?**

71. R: The record indicates that the President gave such a response. Richard Morris testified before the Grand Jury that after explaining to President Clinton that he would lose political support by admitting to obstructing justice and suborning perjury, President Clinton replied "[w]ell, we just have to win then." (Grand Jury Testimony of Richard Morris, 8/18/98, p. 30, H. Doc. 105-316, p. 2930).

72. Q: **Do you admit or deny the past or present existence of or the past or present direct or indirect employment of individuals, other than counsel representing you, whose duties**

include making contact with or gathering information about witnesses or potential witnesses in any judicial proceeding related to any matter in which you are or could be involved?

72. R: The record indicates that such individuals may have been employed for such a purpose. Richard Morris testified before the Grand Jury that there was a “White House Secret Police Operation”, Mr. Morris explained that the operation stemmed “more from Hillary Clinton than from Bill.” Mr. Morris identified Terry Lenzner, Jack Palladino and Betsy Wright as members of this group. (Grand Jury Testimony of Richard Morris, 8/18/98, p. 60, H. Doc. 105-316, p. 2937)
73. Q: **Do you admit or deny having knowledge that Terry Lenzner was contacted or employed to make contact with or gather information about witnesses or potential witnesses in any judicial proceeding related to any matter in which you are or could be involved?**
73. R: The record indicates that Terry Lenzner may have been contacted or employed for such a purpose. Richard Morris testified before the Grand Jury that Terry Lenzner was a member of the “White House Secret Police Operation” but that he was only aware of Mr. Lenzner from news accounts. (Grand Jury Testimony of Richard Morris, 8/18/98, pp. 60,72, H. Doc. 105-316, pp. 2937, 2941).
74. Q: **Do you admit or deny having knowledge that Jack Palladino was contacted or employed to make contact with or gather information about witnesses or potential witnesses in any judicial proceeding related to any matter in which you are or could be involved?**
74. R: The record indicates that Mr. Palladino may have been contacted or employed for such a purpose. Richard Morris testified before the Grand Jury that Mr. Palladino was a member of the “White House Secret Police Operation.” (Grand Jury Testimony of Richard Morris, 8/18/98, pp. 72, H. Doc. 105-316, pp. 2941.)
75. Q: **Do you admit or deny having knowledge that Betsy Wright was contacted or employed to make contact with or gather information about witnesses or potential witnesses in any judicial proceeding related to any matter in which you are or could be involved?**
75. R: The record indicates that Betsy Wright was contacted or employed for such a purpose. Richard “Dick” Morris testified before the Grand Jury that Betsy Wright told him that “what we do is we work on getting material on them to try to induce them not to compromise the President.” Betsy Wright was identified by Mr. Morris as a member of the “White House Secret Police Operation.” (Grand Jury Testimony of Richard Morris, p. 76, H. Doc. 105-316, p. 2941).
76. Q: **Do you admit or deny that you made false and misleading public statements in response to questions asked on or about January 21, 1998, in an interview with Roll Call, when**

you stated “Well, let me say, the relationship was not improper, and I think that’s important enough to say. But because the investigation is going on and because I don’t know what is out – what’s going to be asked of me, I think I need to cooperate, answer the questions, but I think it’s important for me to make it clear what is not. And then, at the appropriate time, I’ll try to answer what is. But let me answer – it is not an improper relationship and I know what the word means.”?

76. R: On August 17, 1998, after testifying before the grand jury, the President addressed the American people from the White House and stated “Indeed I did have a relationship with Ms. Lewinsky that was not appropriate. In fact, it was wrong. It constituted a critical lapse in judgment and a personal failure on my part for which I am solely and completely responsible.” (34 Weekly Compilation of Presidential Documents, p. 1638).

77. Q: **Do you admit or deny that you made false and misleading public statements in response to questions asked on or about January 21, 1998, in the Oval Office during a photo opportunity, when you stated “Now, there are a lot of other questions that are, I think, very legitimate. You have a right to ask them; you and the American people have a right to get answers. We are working very hard to comply and get all the requests for information up here, and we will give you as many answers as we can, as soon as we can, at the appropriate time, consistent with our obligation to also cooperate with the investigations. And that’s not a dodge, that’s really why I’ve – I’ve talked with out people. I want to do that. I’d like for you to have more rather than less, sooner rather than later. So we’ll work through it as quickly as we can and get all those questions out there to you.”?**

77. R: On January 26, 1998, after making the above statement that he would give as many answers as he could, as soon as he could, the President stated publicly “I did not have sexual relations with that woman, Ms. Lewinsky. . . . these allegations are false.”

78. Q: **Do you admit or deny that you discussed with Harry Thomasson, prior to making public statements in response to questions asked by the press in January, 1998, relating to your relationship with Monica Lewinsky, what such statements should be or how they should be communicated?**

78. R: The record indicates that such a discussion occurred. On January 22nd, the President Clinton’s friend and advisor, Harry Thomasson traveled from California to Washington, D.C., and stayed in the White House residence for the next 34 days. Mr. Thomasson advised the President on how best to communicate with the public regarding his relationship with Monica Lewinsky. Mr. Thomasson appeared before the grand jury on August 11, 1998:

Q Okay. Did you talk specifically about his performance in the interview and his responses in the interview? (referring to a January 21, 1998, interview on television with Jim Lehrer)

A Yes. I mean, to the best of my knowledge, I said, “You know, what you said was exactly right, but the press is just saying you were equivocating.” You know. And I said, “If the

allegation is not true, then you shouldn't equivocate. You should explain it so there's no doubt in anybody's mind that nothing happened."

Q Okay. Did you tell the President that you thought he had equivocated in the interview?

A I told the President that I thought his response wasn't as strong as it could have been.

Harry Thomasson testified later that the President replied to Mr. Thomasson's statements by saying "You know, you're right. I should be more forceful than that." Grand Jury Testimony of Harry Thomasson, 8/11/98, pp. 15-16, 27 (H. Doc. 105-316, pp. 3730 and 3733).

79. Q: **Do you admit or deny that you made a false and misleading public statement in response to a question asked on or about January 26, 1998, when you stated "But I want to say one thing to the American people. I want you to listen to me. I'm going to say this again. I did not have sexual relations with that woman, Ms. Lewinsky?"**

79. R: On August 17, 1998, after testifying before the grand jury, the President addressed the American people from the White House and stated "Indeed I did have a relationship with Ms. Lewinsky that was not appropriate. In fact, it was wrong. It constituted a critical lapse in judgment and a personal failure on my part for which I am solely and completely responsible." (34 Weekly Compilation of Presidential Documents, p. 1638).

80. Q: **Do you admit or deny that you made a false and misleading public statement in response to a question asked on or about January 26, 1998, when you stated " ... I never told anybody to lie, not a single time. Never?"**

80. R: The record indicates that the President may have instructed Betty Currie to lie about his relationship with Monica Lewinsky. See Request for Information No. 52.

81. Q: **Do you admit or deny that you directed or instructed Bruce Lindsey, Sidney Blumenthal, Nancy Hernreich and Lanny Breuer to invoke executive privilege before a grand jury empaneled as part of a judicial proceeding by the United States District Court for the District of Columbia Circuit in 1998?**

81. R: The record indicates that Bruce Lindsey, Sidney Blumenthal, Nancy Hernreich and Lanny Breuer all invoked executive privilege when they appeared before the grand jury. Executive privilege, unlike the 5th Amendment privilege against self incrimination, the attorney-client privilege, or the spousal privilege, is not a personal privilege. Executive privilege is constitutionally based – it is rooted in the doctrine of separation of powers. Executive privilege, which adheres to the office of the president and not the occupant of that office, shields communications relating to the exercise of core presidential functions.

Because executive privilege is constitutionally based and because it adheres to the office of the President, only the President can authorize its assertion. Most legal scholars agree it can

not be delegated to subordinates.

The President, while in Africa, publicly denied knowing anything about the assertions. If that is true, his staff invoked the privilege without his authorization which would be unconstitutional and could be viewed as an abuse of power intended to obstruct the investigation.