

best way to explain how I feel what happened was, you know, no one asked or encouraged me to lie, but no one discouraged me, either."

Q. Okay. That—that statement, is that consistent in your view with what you've testified to today?

A. Yes.

Q. Okay. Look at page 234, which is right below there.

A. Okay. [Perusing document.]

Q. Beginning with the—your answer on line 4, and read down, if you could, to line 14—4 through 14.

A. "Yes and no. I mean, I think I also said that Monday that it wasn't as if the President called me and said, You know, Monica, you're on the witness list. This is going to be really hard for us. We're going to have to tell the truth and be humiliated in front of the entire world about what we've done, which I would have fought him on, probably. That was different. And by him not calling me and saying that, you know, I knew what that meant. So I, I don't see any disconnect between paragraph 10 and paragraph 4 on the page. Does that answer your question?"

Q. Okay. Now, has that—has your testimony today been consistent with that provision?

A. I—I think so.

Q. Okay.

A. I've intended for my testimony to be consistent with my grand jury testimony.

Q. Okay. And one final read just below that, line 16 through 24.

A. "Did you understand all along that he would deny the relationship also?"

"Mm-hmm, yes."

Q. And 19 through 24—the rest of that.

A. Oh, sorry.

"And when you say you understood what it meant when he didn't say, Oh, you know you must tell the truth, what did you understand that to mean?"

"That, that, as we had on every other occasion and in every other instance of this relationship, we would deny it."

MR. BRYANT: Okay.

Could we have just—go off the record here a minute?

SENATOR DeWINE: Sure. Let's go off the record at this point.

THE VIDEOGRAPHER: We're going off the record at 1459 hours.

[Recess.]

THE VIDEOGRAPHER: We're going back on the record at 1504 hours.

SENATOR DeWINE: Manager Bryant, you may proceed.

MR. BRYANT: Thank you, Senator.

BY MR. BRYANT:

Q. Ms. Lewinsky, I have just a few more questions here.

With regard to the false affidavit, you do admit that you filed an untruthful affidavit with the court in the Jones case; is that correct?

A. I think I—I—yes—I mean, it was incomplete and misleading, and—

Q. Okay. With regard to the cover stories, on December the 6th, you and the President went over cover stories, and in the same conversation he encouraged you to file an affidavit in the Jones case; is that correct?

A. No.

MS. SELIGMAN: I think that misstates the record.

BY MR. BRYANT:

Q. All right. On December the 17th. Let's try December 17; all right?

A. Okay.

Q. You and the President went over cover stories—that's the telephone conversation—

A. Okay—I'm sorry—can you repeat the question?

Q. Okay. Went over December 17th, you and the President went over cover stories in a telephone conversation.

A. Correct.

Q. And in that same telephone conversation, he encouraged you to file an affidavit in the Jones case?

A. He suggested I could file an affidavit.

Q. Okay. With regard to the job, between your meeting with Mr. Jordan in early November and December the 5th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?

MS. SELIGMAN: Objection. Misstates the record.

BY MR. BRYANT:

Q. Okay. You can answer that.

A. It—

Q. Let me repeat it. Between your meeting with Mr. Jordan in early November and December the 5th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?

MS. SELIGMAN: Same objection.

THE WITNESS: Do you mean when I met with him again on December 11th? I don't—

MR. BRYANT: The—

THE WITNESS: —I didn't meet with Mr. Jordan on December 5th. I'm sorry—

MR. BRYANT: Okay.

THE WITNESS: —am I misunderstanding something?

MR. BRYANT: We're getting our numbers wrong here.

THE WITNESS: Okay.

BY MR. BRYANT:

Q. Between your meeting with Mr. Jordan in early November and December the 11th when you met with Mr. Jordan again, you did not feel that Mr. Jordan was doing much to help you get a job; is that correct?

A. I hadn't seen any progress.

Q. Okay. After you met with Mr. Jordan in early December, you began to interview in New York and were much more active in your job search; correct?

A. Yes.

Q. In early January, you received a job offer from Revlon with the help of Vernon Jordan; is that correct?

A. Yes.

Q. Okay. With regard to gifts, regarding the gifts that were subpoenaed in the Jones case, you are certain that Ms. Currie called you and that she understood you had something to give her; is that correct?

A. That's my recollection.

Q. You never told Ms. Currie to come pick up the gifts or that Michael Isikoff had called about them; is that correct?

A. I don't recall that.

Q. Regarding stalking, you never stalked the President; is that correct?

A. I—I don't believe so.

Q. Okay. You and the President had an emotional relationship as well as a physical one; is that right?

A. That's how I'd characterize it.

Q. Okay. He never rebuffed you?

A. I—I think that gets into some of the intimate details of—no, then, that's not true. There were occasions when he did.

Q. Uh-huh. Okay. But he never rebuffed you initially on that first day, November the 15th, 1995?

A. No, sir.

LAW OFFICES OF

PLATO CACHERIS,

Washington, DC, February 2, 1999.

Re February 1, 1999, Monica S. Lewinsky deposition transcript.

DEAR MS. JARDEM AND MR. BITSKO: Upon our review of the videotape and transcript of Monica S. Lewinsky's deposition transcript, we have noted the following errors or omissions:

Page	Line	Corrections
24	9	"second . . ." should replace "24"
44	6	Comments by counsel are not transcribed.
61	11-13	Delete quotation marks. These are not direct quotes in this instance.
62	23	"down" should replace "down"
63	17	"called" should replace "found"
63	23	"after Thanksgiving" should follow "back."
63	24	Insert following line 23: A. Yes I did. Q. What did he tell you then? "chotchkie" should replace "chuckie"
65	21	"on" should replace "home"
65	24	The line should read: "see if I could see the President. I apologize," not "see if I could see the President and apologize."
66	20	"needed" should replace "need"
75	1	"the" should replace "some"
90	5	"said" should precede "ist"
116	16	"that's" should replace "of"
128	9	Delete quotation marks.
154	5	"Sideman" should replace "Sideman"
156	6	"Fellen" should replace "Fleiser"
161	15	

Provided these changes are made, we will waive signature on behalf of Ms. Lewinsky. We understand from Senate Legal Counsel that copies of this letter will be made available to the parties and Senate. Thank you for your assistance. Sincerely,

PLATO CACHERIS.  
PRESTON BURTON.  
SYDNEY HOFFMANN.

IN THE SENATE OF THE UNITED STATES SITTING FOR THE TRIAL OF THE IMPEACHMENT OF WILLIAM JEFFERSON CLINTON, PRESIDENT OF THE UNITED STATES  
EXCERPTS OF VIDEO DEPOSITION OF VERNON E. JORDAN, JR.  
(Tuesday, February 2, 1999, Washington, D.C.)

SENATOR THOMPSON: All right. If there are no further questions from the parties or counsel for the witness, I'll now swear in the witness. Mr. Jordan, will you please raise your right hand?  
Do you, Vernon E. Jordan, Jr., swear that the evidence you shall give in this case now pending between the United States and William Jefferson Clinton, President of the United States, shall be the truth, the whole truth, and nothing but the truth, so help you, God?  
THE WITNESS: I do.  
Whereupon, VERNON E. JORDAN, JR., was called as a witness and, after having been first duly sworn by Senator Fred Thompson, was examined and testified as follows:  
SENATOR THOMPSON: All right. The House Managers may begin their questioning of the witness.  
MR. HUTCHINSON: Thank you, Senator Thompson and Senator Dodd.  
EXAMINATION BY HOUSE MANAGERS  
BY MR. HUTCHINSON:  
Q. Good morning, Mr. Jordan. For the record, would you state your name, please?  
A. Good morning, Congressman. My name is Vernon E. Jordan, Jr.  
Q. And, Mr. Jordan, we have not had the opportunity to meet previously, is that correct?  
A. That is correct.  
Q. And I do appreciate—I have met your counsel, Mr. Hundley, in his office, and so I've looked forward to this opportunity to meet you. Now, you have—  
A. I can't say that the feeling is mutual. [Laughter.]  
BY MR. HUTCHINSON:  
Q. I certainly understand.  
You have testified, I believe, five times previously before the Federal grand jury?  
A. That is correct.  
Q. And so I know that probably about every question that could be asked has been asked, but there are a number of reasons I want to go over additional questions with you, and some of them will be repetitious of what's been asked before.

Prior to coming in today, though, have you had the opportunity to review your prior testimony in those five appearances before the grand jury?

A. I have done some preparation, Congressman.

Q. And let me start with the fact that the oath that you took today is the same as the oath that you took before the Federal grand jury?

A. I believe that's correct.

Q. And, Mr. Jordan, what is your profession?

A. I am a lawyer.

Q. And where do you practice your profession?

A. I am a senior partner at the law firm of Akin, Gump, Strauss, Hauer & Feld, here in Washington, D.C., with offices in Texas, California, Pennsylvania and New York, three offices in Europe, London, Brussels and Moscow.

Q. And how long have you been a senior partner?

A. I have been a senior partner—well, I didn't start out as a senior partner. I started out as a partner, and at some point—I don't know when, but not long thereafter I was elevated to this position of senior partner.

Q. And what type of law do you practice?

A. I am a corporate international generalist at Akin, Gump.

Q. And does Akin, Gump have about 800 lawyers?

A. We have about 800 lawyers, yes.

Q. Which is an incredible number for lawyers from someone who practiced law in Arkansas.

How do all of those lawyers—

A. We have some members of our law firm who are from Arkansas, so it's not unusual for them.

Q. And how is it that you are able to obtain enough business for 800 lawyers?

A. I don't think that's my entire responsibility. I'm just one of 800 lawyers, and that is what I do in part, but I'm not alone in that process of making rain.

Q. When you say "making rain," that's the terminology of being a rainmaker?

A. I think even in Arkansas, you understand what rainmaking is.

Q. We've read Grisham books.

And so, when you say making rain or being a rainmaker, that is to bring in business so that you can keep the lawyers busy practicing law?

A. Well, that is—that is part and parcel of the practice of law.

Q. And do you bill by the hour?

A. I do not.

Q. And I understand you used to, but you do not anymore?

A. I graduated.

Q. A fortunate graduation.

And when the—when you did bill by the hour, what was your billable rate the last time you had to do that?

A. I believe my billable rate at the last time was somewhere between 450 and 500 an hour.

Q. Now, would you describe—

A. Not bad for a Georgia boy. I'm from Georgia. You've heard of that State, I'm sure.

Q. It's probably not bad from Washington standards.

Would you describe the nature of your relationship with President Clinton?

A. President Clinton has been a friend of mine since approximately 1973, when I came to your State, Arkansas, to make a speech as president of the National Urban League about race and equal opportunity in our Nation, and we met then and there, and our friendship has grown and developed and matured and he is my friend and will continue to be my friend.

Q. And just to further elaborate on that friendship, it's my understanding that he and his—and the First Lady has had Christmas Eve dinner with you and your family for a number of years?

A. Every year since his Presidency, the Jordan family has been privileged to entertain the Clinton family on Christmas Eve.

Q. And has there been any exceptions in recent years to that?

A. Every year that he has been President, he has had, he and his family, Christmas Eve with my family.

Q. And have you vacationed together with the Clinton family?

A. Yes. I think you have seen reels of us playing golf and having fun at Martha's Vineyard.

Q. And so you vacation together, you play golf together on a semi-regular basis?

A. Whenever we can. We've not been doing it recently, for reasons that I think are probably very obvious to you, Counsel.

Q. Well, explain that to me.

A. Just what I said, for a time, I was going before the grand jury, and under the advice of counsel and I'm sure under advice of the President's counsel, it was thought best that we not play golf together.

So, from the time that I first went to the grand jury, I don't think—we have not played golf this year, unfortunately, together.

Q. Since you—I think your first appearance at the grand jury was March 3 of '98. Then you went March 5, and then in May, I believe you were two times before the grand jury and then one in June of '98.

Since your last testimony before the grand jury in June of '98, have you been in contact with the President of the United States?

A. Yes, I have.

Q. And are these social occasions or for business purposes?

A. Social occasions. I was invited to the Korean State Dinner. I forget when that was. I think that was the first time I was in the White House since Martin Luther King Day of last year.

I saw the President at Martha's Vineyard. I was there when he got off Air Force One to greet him and welcome him to—the Vineyard, and I was at the White House for one of the performances about music. The Morgan State Choir sang, and so I've been to the White House only for social occasions in the last year since Martin Luther King's birthday, I believe.

Q. Have you had any private conversations with the President?

A. Yes, I have, as a matter of fact.

Q. And has this been on the telephone or in person?

A. I've talked to him on the telephone, and I talked to him at the Vineyard. He was at my house on Christmas Eve. There were a lot of people around, but, yes, I've talked to the President.

Q. And did you discuss your testimony before the grand jury or his testimony before the grand jury?

A. I did not.

Q. There was one reference that he made in his Federal grand jury testimony, and I'll refer counsel, if they would like. It was on page 77 of the President's testimony in his appearance before the grand jury on August 17th.

And he referenced discussions with you, and he said, "I think I may have been confused in my memory because I've also talked to him on the phone about what he said, about whether he had talked to her or met with her. That's all I can tell you," and I believe the "her" is a reference to Ms. Lewinsky.

And it appeared to me from reading that, that there might have been some conversa-

tions with you by the President, perhaps in reference to your grand jury testimony or your knowledge of when and how you talked to Ms. Lewinsky.

A. If I understand your question about whether or not the President of the United States and I talked about my testimony before the grand jury or his testimony before the grand jury, I can say to you unequivocally that the President of the United States and I have not discussed our testimony. I was advised by my counsel, Mr. Hundley, not to discuss that testimony, and I have learned in this process, Mr. Hutchinson, to—take the advice of counsel.

Q. I would certainly agree that that is good counsel to take, but going back to the question—and I will try to rephrase it because it was a very wordy question that I asked you—and it's clear from your testimony that you have not discussed your grand jury testimony—

A. That is correct.

Q.—but did you, subsequent to your last testimony before the grand jury, talk to the President in which you discussed conversation that you have had with Monica Lewinsky?

A. I have not discussed a conversation that I have had with Monica Lewinsky with the President of the United States.

Q. And have you had any discussions about Monica Lewinsky with the President of the United States since your last testimony before the grand jury?

A. I have not.

Q. Now, going back to your relationship with the President, you have been described as a friend and advisor to the President. Is that a fair terminology?

A. I think that's fair.

Q. And in the advisor capacity, had you served as co-chairman of the Clinton-Gore transition team in 1997?

A. I believe I was chairman.

Q. That is an important distinction.

And have you served in any other official or semi-official capacities for this administration?

A. I have not, except that I was asked by the President to lead the American delegation to the inauguration of President Li in Taiwan, and that was about as official as you can get, but beyond that, I have not—not had any official capacity.

For a very brief moment, very early in the administration, I was appointed to the Foreign Intelligence Advisory Committee, and I went to one meeting and stayed half that meeting, went across the street and told Bruce Lindsey that that was not for me.

Q. Now, let's move on. After we've established to a certain degree your relationship with the President, let's move on to January 20th of 1998, and just to put that in clearer terms, this is a Tuesday after the January 17 deposition of President Clinton in the Paula Jones civil rights case. Do you recall that time frame?

A. [Nodding head up and down.]

Q. This is in the afternoon of January 20th, again, after the President's deposition. You contacted Mr. Howard Gittis, who I believe is General Counsel of McAndrews & Forbes Holdings?

A. Howard Gittis is Vice Chairman of McAndrews, Forbes, and he is not the General Counsel. He is a lawyer, but he is not the General Counsel.

Q. And what was the purpose of you contacting Mr. Howard Gittis on January 20th?

A. If I talked to Howard Gittis on the 20th, I don't recall exactly what my conversation with Howard Gittis was about. I think it was a telephone call, maybe.

Q. And that's difficult. Let me see if I can't help you in that regard.

A. Right.

Q. Was the purpose of that call with Mr. Gittis to arrange breakfast the next morning on January 21st?

A. Yeah. I was in New York, and I did call Mr. Gittis and say—and as I remember, I had breakfast with him on the 21st, I believe. Yes, I did.

Q. And this is a breakfast that you had set up?

A. Yes.

Q. And what was the reason you made the decision to request a breakfast meeting with Mr. Gittis?

A. Yes. As I remember, I had gotten a telephone call from David Bloom at 1 o'clock in the morning at the St. Regis Hotel about the matter that was about to break having to do with the entire Lewinsky matter, and I had not at any time discussed the Lewinsky matter with—with Howard Gittis. And so I had breakfast with him to tell him that reporters were calling, that this would obviously involve Revlon, which had responded to my—my efforts to find Ms. Lewinsky employment, and so Howard Gittis is a friend of mine. Howard Gittis is a fellow board member with me at Revlon. He is the Vice Chairman of McAndrews & Forbes, and I thought it—I thought I had—it was incumbent upon me to stop and say, "Listen, there's trouble a-brewing."

Q. And just—you've mentioned McAndrews & Forbes and Revlon. McAndrews & Forbes, am I correct, is the parent company of—

A. It's the holding company.

Q. The holding company of Revlon and presumably other companies.

And you sit on the board of McAndrews & Forbes?

A. I do not. I sit on the board of Revlon.

Q. All right. And that is a position that brings you an annual salary—

A. There is a director's fee.

Q. You receive a director's fee, and in addition, your law firm receives—from business from—

A. We do—

Q.—Revlon?

A. We do. We do business. We've represented Revlon, and we represented Revlon before I was elected a director.

Q. And you mention that things were breaking that you felt like you needed to advise Mr. Gittis concerning. At the time that you made the arrangements for the breakfast on January 21st, had you become aware of the Drudge Report?

A. Yes, I had.

Q. And you had had lunch with Bruce Lindsey on January 20th?

A. No. I don't think it was on January—it was on Sunday. No, that was not the 20th.

Q. And during that luncheon, did you become aware of the Drudge Report—

A. That is correct.

Q.—and receive a copy of it?

A. That is correct.

Q. And that was from Bruce Lindsey?

A. That is correct.

Q. And that Drudge Report, did it mention your name?

A. I don't think so, but I don't remember.

Q. Was there some news stories that had mentioned your name in reference to Ms. Lewinsky and the President?

A. I believe that my name has been an integral part of this process from the beginning.

Q. And did you in fact have the breakfast meeting with Mr. Gittis?

A. Yes, I did.

Q. And what information did you convey to Mr. Gittis concerning Ms. Lewinsky at that breakfast meeting?

A. I just simply said that the press was calling about Ms. Lewinsky; that while I had not dealt with him, I had dealt with Richard Halperin, I had dealt with Ronald Perelman.

I had not dealt with him, but that he ought to know and that I was sorry about this.

And I also said that it would probably be even more complicated because early on I had referred Webb Hubbell to them to be hired as counsel.

Q. And I want to get to that in just a moment, but you indicated that you said you were sorry. Were you referring to the problems that this might create for the company?

A. Well, I was obviously concerned. I am a director. I am their counsel. They're my friends. And publicity was breaking. I thought I had some responsibility to them to give them a heads-up as to what was going on.

Q. Now, is it true that your efforts to find a job for Ms. Lewinsky that you referenced in that meeting with Mr. Gittis—were your efforts carried out at the request of the President of the United States?

A. There is no question but that through Betty Currie, I was acting on behalf of the President to get Ms. Lewinsky a job. I think that's clear from my grand jury testimony.

Q. Okay. And I just want to make sure that that's firmly established. And in reference to your previous grand jury testimony, you indicated, I believe, on May 28th, 1998, at page 61, that "She"—referring to Betty Currie—"was the one that called me at the behest of the President."

A. That is correct, and I think, Congressman, if in fact the President of the United States' secretary calls and asks for a request that you try to do the best you can to make it happen.

Q. And you received that request as a request coming from the President?

A. I—I interpreted it as a request from the President.

Q. And then, later on in June of '98 in the grand jury testimony at page 45, did you not reference or testify that "The President asked me to get Monica Lewinsky a job"?

A. There was no—there was no question but that he asked me to help and that he asked others to help. I think that is clear from everybody's grand jury testimony.

Q. And just one more point in that regard. In the same grand jury testimony, is it correct that you testified that "He"—referring to the President—"was the source of it coming to my attention in the first place"?

A. I may—if that is—if you—if it's in the—

Q. It's at page 58 of the grand jury—

A. I stand on my grand jury testimony.

Q. All right. Now, during your efforts to secure a job for Ms. Lewinsky, I think you mentioned that you talked to Mr. Richard Halperin.

A. Yes.

Q. And he is with McAndrews & Forbes?

A. Yes.

Q. And you also at one point talked to Mr. Ron Perelman; is that correct?

A. I made a call to Mr. Perelman, I believe, on the 8th of January.

Q. And he is the—

A. He is the chairman/CEO of McAndrews Forbes. He is a majority shareholder in McAndrews Forbes. This is his business.

Q. Now, at the time that you requested assistance in obtaining Ms. Lewinsky a job, did you advise Mr. Perelman or Mr. Halperin of the fact that the request was being carried out at the request of the President of the United States?

A. I don't think so. I may have.

Q. Well, the first answer you gave was "I don't think so." Now, in fact, you did not advise either Mr. Perelman or Mr. Halperin of that fact because am I correct that Mr. Perelman—or, excuse me, Mr. Gittis—expressed some concern that Revlon was never advised of that fact?

A. Then, uh, I cannot say, I guess, precisely that I told that "I am doing this for the President of the United States."

I do believe, on the other hand, that given the fact that she was in the White House, given the fact that she had been a White House intern, I would not be surprised if that was their understanding.

Q. Well, in your conversation with Mr. Halperin.

A. Yes—I'm certain I did not say that to Richard Halperin.

Q. Okay. So there's no question that you did not tell Mr. Halperin that you were acting at the request of the President?

A. I'm fairly certain I did not.

Q. And in your conversation with Mr. Perelman, did you indicate to him that you were calling—or you were seeking—employment for Ms. Lewinsky at the request of the President?

A. Yes—I don't think that I, that I made that explicit in my conversation with Mr. Perelman, and I'm not sure I thought it necessary to say "This is for the President of the United States."

By the same token, I would have had no hesitation in doing that.

Q. Now, at the time that you had called Mr. Perelman, which I believe you testified was in January of '98—

A. That's right.

Q.—I think you said January 8th—

A. Right.

Q.—you were aware at that time, were you not, that Ms. Lewinsky had received a subpoena to give a deposition in the Jones versus Clinton case?

A. That is correct.

Q. At the time that you talked to Mr. Perelman requesting his assistance for Monica Lewinsky, did you advise Mr. Perelman of the fact that Ms. Lewinsky was under subpoena in the Jones case?

A. I did not.

Q. And when you—did Mr. Perelman, Mr. Gittis or Mr. Halperin ever express to you disappointment that they were not told of two facts—either of these two facts—one, that Ms. Lewinsky was being helped at the request of the President; and secondly, that she was known by you and the President to be under subpoena in that case?

A. No.

Q. Now, you are on the board of directors of Revlon.

A. I am.

Q. And how long have you been on the board of Revlon?

A. I forget. Ten years, maybe.

Q. And as a member of the board of directors, do you not have a fiduciary responsibility to the company?

A. I do.

Q. And how would you define a fiduciary responsibility?

A. I define my fiduciary responsibility to the company about company matters.

Q. And how would you define fiduciary responsibility in reference to company matters?

A. Anything that has to do with the company, that I believe in the interest of the company, I have some fiduciary responsibility to protect the company, to help the company in any way that I—that is possible.

Q. And is fiduciary responsibility sometimes considered a trust relationship in which you owe a degree of trust and responsibility to someone else?

A. I think—I think that "trust" and "fiduciary" are probably synonymous.

Q. Okay. Do you believe that you were acting in the company's interest or the President's interest when you were trying to secure a job for Ms. Lewinsky?

A. Well, what I knew was that the company would take care of its own interest. This is not the first time that I referred somebody, and what I know is, is that if a person being referred does not meet the

standards required for that company, I have no question but that that person will not be hired. And so the referral is an easy thing to do; the judgment about employment is not a judgment as a person referring that I make. But I do have confidence in all of the companies on whose boards that I sit that, regardless of my reference, that as to their needs and as to their expectations for their employees that they will make the right decisions, as happened in the American Express situation.

American Express called and said: We will not hire Ms. Lewinsky. I did not question it, I did not challenge it, because they understood their needs and their needs in comparison to her qualifications. They made a judgment. Revlon, on the other hand, made another judgment.

I am not the employer, I am the referrer, and there is a major difference.

Q. Now, going back to what you knew as far as information and what you conveyed to Revlon, you indicated that you did not tell Mr. Halperin that you were making this request or referral at the request of the President of the United States.

A. Yes, and I didn't see any need to do that.

Q. And then, when you talked to Mr.—

A. Nor do I believe not saying that, Counselor, was a breach of some fiduciary relationship.

Q. And when you had your conversation with Mr. Perelman—

A. Right.

Q.—at a later time—

A. Right.

Q.—you do not remember whether you told him—you do not believe you told him you were calling for the President—

A. I believe that I did not tell him.

Q.—but you assumed that he knew?

A. No. I did not make any assumptions, let me say. I said: Ronald, here is a young lady who has been interviewed. She thinks the interview has not gone well. See what you can do to make sure that she is properly interviewed and evaluated—in essence.

Q. And did you reference her as a former White House intern?

A. Probably. I do not have a recollection of whether I described her as a White House intern, whether I described her as a person who had worked for the Pentagon. I said this is a person that I have referred.

I think, Mr. Hutchinson, that I have sufficient, uh, influence, shall we say, sufficient character, shall we say, that people have been throughout my career able to take my word at face value.

Q. And so you didn't need to reference the President. The fact that you were calling Mr. Perelman—

A. That was sufficient.

Q.—and asking for a second interview for Ms. Lewinsky, that that should be sufficient?

A. I thought it was sufficient, and obviously, Mr. Perelman thought it was sufficient.

Q. And so there is no reason, based on what you told him, for him to think that you were calling at the request of the President of the United States?

A. I think that's about right.

Q. And so, at least with the conversation with Mr. Halperin and Mr. Perelman, you did not reference that you were acting in behalf of the President of the United States. Was there anyone else that you talked to at Revlon in which they might have acquired that information?

A. The only persons that I talked to in this process, as I explained to you, was Mr. Halperin and Mr. Perelman about this process. And it was Mr. Halperin who put the—who got the process started.

Q. So those are the only two you talked about, and you made no reference that you were acting in behalf of the President?

A. Right.

Q. Now, the second piece of information was the fact that you knew and the President knew that Ms. Lewinsky was under subpoena in the Jones case, and that information was not provided to either Mr. Halperin or to Mr. Perelman; is that correct?

A. That's correct.

Q. Now, I wanted to read you a question and answer of Mr. Howard Gittis in his grand jury testimony of April 23, 1998.

The question was: "Now, you had mentioned before that one of the responsibilities of director is to have a fiduciary duty to the company. If it was the case that Ms. Lewinsky had been noticed as a witness in the Paula Jones case, and Vernon Jordan had known that, is that something that you believe as a person who works for McAndrews & Forbes, is that something that you believe that Mr. Jordan should have told you, or someone in the company, not necessarily you, but someone in the company, when you referred her for employment?"

His answer was "Yes."

Do you disagree with Mr. Gittis' conclusion that that was important information for McAndrews & Forbes?

A. I obviously didn't think it was important at the time, and I didn't do it.

Q. Now, in your previous answers, you reference the fact that you—

A. I think, on the other hand, that had she been a defendant in a murder case and I knew that, then I probably wouldn't have referenced her. But her being a witness in a civil case I did not think important.

Q. Despite the fact that you were acting at the request of the President, and this witness was potentially adverse to the President's interest in that case?

A. I didn't know that. I mean, I don't—I don't know what her position was or whether it was adverse or not.

Q. All right. Mr. Jordan, prior to you answering that, did you get an answer from your attorney?

A. My attorney mumbled something in my ear, but I didn't hear him.

MR. HUNDLEY: It was a spontaneous remark. I'll try to refrain.

MR. HUTCHINSON: I know that—

THE WITNESS: He does have a right to mumble in my ear, I think.

MR. HUNDLEY: I mumble too loud because I don't hear too well myself.

BY MR. HUTCHINSON:

Q. Now, going back to a complicating factor in your conversation with Mr. Gittis and this embarrassing situation of the Lewinsky job, the complicating fact was that you had also helped Webb Hubbell get a job or consulting contracts with the same company; is that—

A. Yes. You use the word "complicated." I did not view it as a complication. I viewed it as a, as another something that happened, and that that caused some embarrassment to the company, and here again, we were back for another embarrassment for the company, and I thought I had a responsibility to say that.

Q. Would you explain how you helped Webb Hubbell secure a job or a contract with Revlon?

A. Yes. Webb Hubbell came to me after his resignation from the Justice Department. Webb and I got to be friends during the transition, and Webb came to me and he said, "I'm leaving the Justice Department," or "I've left the Justice Department"—I'm not sure which—and he said, "I really need work."

And I said, "Webb, I will do what I can to help you."

I called New York, made arrangements. I took Webb Hubbell to New York. We had lunch. I took him the headquarters of McAndrews & Forbes at 62nd Street. I introduced him to Howard Gittis, Ronald Perelman, and I left.

Q. And did, subsequently, Mr. Hubbell obtain consulting contracts with Revlon?

A. Subsequently, Mr. Hubbell was hired, as I understand it, as outside counsel to McAndrews & Forbes, or Revlon, or some entity within the Perelman empire.

Q. And was that consulting contracts of about \$100,000 a year?

A. I—I think so, I think so.

Q. And did you make other contacts with other companies in which you had friends for assistance for Webb Hubbell?

A. I did not.

Q. And was the effort to assist Mr. Webb Hubbell during this time—was it after he left the Department of Justice and prior to the time that he pled guilty to criminal charges?

A. That is correct.

Q. And at the time you assisted Webb Hubbell by securing a job with Revlon for him, was he a potential adverse witness to the President in the ongoing investigation by the Independent Counsel?

A. I don't know whether he was an adverse witness or not. What he was was my friend who had just resigned from the Justice Department, and he was out of work, and he asked for help, and I happily helped him.

Q. And did you know at the time that he was a potential witness in the investigation by the OIG?

A. I don't know whether I knew whether he was a potential witness or not. I simply responded to Webb Hubbell who was a friend in trouble and needing work.

Q. Now, let's backtrack to the time when you first had any contact with Ms. Lewinsky. We've talked about this January 20-21st meeting with Mr. Gittis and covered a little bit of the tail end of this entire episode. Now I would like to go back in time to your first meetings with Ms. Lewinsky.

Now, when was the first time that you recall that you met with Monica Lewinsky?

A. If you've read my grand jury testimony—

Q. I have.

A.—and I'm sure that you have—there is testimony in the grand jury that she came to see me on or about the 5th of November. I have no recollection of that. It was not on my calendar, and I just have no recollection of her visit. There is a letter here that you have in evidence, and I have to assume that in fact that happened. But as I said in my grand jury testimony, I'm not aware of it, I don't remember it—but I do not deny that it happened.

Q. And Ms. Lewinsky has made reference to a meeting that occurred in your office on November 5, and that's the meeting that you have no recollection of?

A. That is correct. We have no record of it in my office, and I just have no recollection of it.

Q. And in your first grand jury appearance, you were firm, shall I say, that the first time you met with Ms. Lewinsky, that it was on December 11th?

A. Yes. It was firm based on what my calendar told me, and subsequently to that, there has been a refreshing of my recollection, and I do not deny that it happened. By the same token, I will tell you, as I said in my grand jury testimony, that I did not remember that I had met with her.

Q. And in fact today, the fact that you do not dispute that that meeting occurred is not based upon your recollection but is simply based upon you've seen the records, and it appears that that meeting occurred?

A. That is correct.

Q. Okay. And you've made reference to my first exhibit there, which is front of you, and I would refer you to this at this time, which is Exhibit 86.

Now, this is captioned as a "Letter from Ms. Lewinsky to Mr. Vernon Jordan dated November 6, 1997," and it appears that this letter thanks you for meeting with her in reference to her job search. And do you recall this—

MR. KENDALL: Mr. Hutchinson, excuse me. May I ask—this is an unsigned copy. Do you have a signed copy of this letter?

MR. HUTCHINSON: Let me go through my questions if I might.

BY MR. HUTCHINSON:

Q. Do you recall receiving this letter?

A. I do not.

Q. Do you ever recall seeing this letter before?

A. The first time I saw this letter was when I was before the grand jury.

Q. And am I correct that it's your testimony that the first time you ever recall hearing the name "Monica Lewinsky" was in early December of '97?

A. That's correct. I—I may have heard the name before, but the first time I remember seeing her and having her in my presence was then.

Q. Well, regardless of whether you met with her in November or not, the fact is you did not do anything in November to secure a job for Ms. Lewinsky until your activities on December 11 of '97?

A. I think that's correct.

Q. And on December 11, I think you made some calls for Ms. Lewinsky on that particular day?

A. I believe I did. I have some—it's all right for me to refresh my recollection?

Q. Certainly.

A. Thank you. [Perusing documents.] I did make calls for her on the 11th, yes.

Q. And may I just ask what you're referring to?

A. I'm referring here to telephone logs prepared by counsel here for me to refresh my recollection about calls.

MR. HUNDLEY: You are welcome to have a copy of that.

THE WITNESS: You are welcome to see it. MR. HUTCHINSON: Do you have an extra copy?

THE WITNESS: Yes—in anticipation.

MR. HUNDLEY: There are a few calls.

SENATOR THOMPSON: Might this be a good time to take a 5-minute break?

MR. HUTCHINSON: Certainly.

SENATOR THOMPSON: All right. Let's adjourn for 5 minutes.

THE VIDEOGRAPHER: We are going off the record at 10:03 a.m.

[Recess.]

THE VIDEOGRAPHER: We're going back on the record at 10:16 a.m.

SENATOR THOMPSON: All right. Counsel has consumed 38 minutes.

Counsel, would you proceed?

MR. HUTCHINSON: Thank you, Senator Thompson.

At this time, I would offer as Jordan Deposition Exhibit 86, if you don't mind me going by that numerology—

SENATOR THOMPSON: Would it be better to do that or make it Jordan Exhibit Number 1? Does counsel have any preference on that—is that—

MR. HUTCHINSON: One is fine.

SENATOR THOMPSON: Let's do it that way. It will be made a part of the record, Jordan Deposition Number 1.

[Jordan Deposition Exhibit No. 1 marked for identification.]

BY MR. HUTCHINSON:

Q. Mr. Jordan, let me go back to that meeting on December 11th. I believe we were discussing that. My question would be: How

did the meeting on December 11 of 1997 with Ms. Lewinsky come about?

A. Ms. Lewinsky called my office and asked if she could come to see me.

Q. And was that preceded by a call from Betty Currie?

A. At some point in time, Betty Currie had called me, and Ms. Lewinsky followed up on that call, and she came to my office, and we had a visit.

Q. Ms. Lewinsky called, set up a meeting, and at some point sent you a resume, I believe.

A. I believe so.

Q. And did you receive that prior to the meeting on December 11th?

A. I—I have to assume that I did, but I—I do not know whether she brought it with her or whether—it was at some point that she brought with her or sent to me—somehow it came into my possession—a list of various companies in New York with which she had—which were here preferences, by the way—most of which I did not know well enough to make any calls for.

Q. All right. And I want to come back to that, but I believe—would you dispute if the record shows that you received the resume of Ms. Lewinsky on December 8th?

A. I would not.

Q. And presumably, the meeting on December 11th was set up somewhere around December 8th by the call from Ms. Lewinsky?

A. I—I would not dispute that, sir.

Q. All right. Now, you mentioned that she had sent you a—I guess some people refer to it—a wish list, or a list of jobs that she—

A. Not jobs—companies.

Q.—companies that she would be interested in seeking employment with.

A. That's correct.

Q. And you looked at that, and you determined that you wanted to go with your own list of friends and companies that you had better contacts with.

A. I'm sure, Congressman, that you too have been in this business, and you do know that you can only call people that you know or feel comfortable in calling.

Q. Absolutely. No question about it. And let me just comment and ask you response to this, but many times I will be listed as a reference, and they can take that to any company. You might be listed as a reference and the name "Vernon Jordan" would be a good reference anywhere, would it not?

A. I would hope so.

Q. And so, even though it was a company that you might not have the best contact with, you could have been helpful in that regard?

A. Well, the fact is I was running the job search, not Ms. Lewinsky, and therefore, the companies that she brought or listed were not of interest to me. I knew where I would need to call.

Q. And that is exactly the point, that you looked at getting Ms. Lewinsky a job as an assignment rather than just something that you were going to be a reference for.

A. I don't know whether I looked upon it as an assignment. Getting jobs for people is not unusual for me, so I don't view it as an assignment. I just view it as something that is part of what I do.

Q. You're acting in behalf of the President when you are trying to get Ms. Lewinsky a job, and you were in control of the job search?

A. Yes.

Q. Now, going back—going to your meeting that we're talking about on December 11th, prior to the meeting did you make any calls to prospective employers in behalf of Ms. Lewinsky?

A. I don't think so. I think not. I think I wanted to see her before I made any calls.

Q. And so if they were not before, after you met with her, you made some calls on December 11th?

A. I—I believe that's correct.

Q. And you called Mr. Richard Halperin of McAndrews & Forbes?

A. That's right.

Q. You called Mr. Peter—

A. Georgescu.

Q.—Georgescu. And he is with what company?

A. He is chairman and chief executive officer of Young & Rubicam, a leading advertising agency on Madison Avenue.

Q. And did you make one other call?

A. Yes. I called Ursie Fairbairn, who runs Human Resources at American Express, at the American Express Company, where I am the senior director.

Q. All right. And so you made three calls on December 11th. You believe that they were after you met with Ms. Lewinsky—

A. I doubt very seriously if I would have made the calls in advance of meeting her.

Q. And why is that?

A. You sort of have to know what you're talking about, who you're talking about.

Q. And what did you basically communicate to each of these officials in behalf of Ms. Lewinsky?

A. I essentially said that you're going to hear from Ms. Lewinsky, and I hope that you will afford her an opportunity to come in and be interviewed and look favorably upon her if she meets your qualifications and your needs for work.

Q. Okay. And at what level did you try to communicate this information?

A. By—what do you mean by "what level"?

Q. In the company that you were calling, did you call the chairman of human resources, did you call the CEO—who did you call, or what level were you seeking to talk to?

A. Richard Halperin is sort of the utility man; he does everything at McAndrews & Forbes. He is very close to the chairman, he is very close to Mr. Gittis. And so at McAndrews & Forbes, I called Halperin.

As I said to you, and as my grand jury testimony shows, I called Young & Rubicam, Peter Georgescu as its chairman and CEO. I have had a long-term relationship with Young & Rubicam going back to three of its CEOs, the first being Edward Ney, who was chairman of Young & Rubicam when I was head of the United Negro College Fund, and it was during that time that we developed the great theme, "A mind is a terrible thing to waste." So I have had a long-term relationship with Young & Rubicam and with Peter Georgescu, so I called the chairman in that instance.

At American Express, I called Ms. Ursie Fairbairn who is, as I said before, in charge of Human Resources.

So that is the level—in one instance, the chairman; in one instance a utilitarian person; and in another instance, the head of the Human Resources Department.

Q. And the utilitarian connection, Mr. Richard Halperin, was sort of an assistant to Mr. Ron Perelman?

A. That's correct. He's a lawyer.

Q. Now, going to your meeting on December 11th with Ms. Lewinsky, about how long of a meeting was that?

A. I don't—I don't remember. You have a record of it, Congressman.

Q. And actually, I think you've testified it was about 15 to 20 minutes, but don't hold me to that, either.

During the course of the meeting with Ms. Lewinsky, what did you learn about her?

A. Uh, enthusiastic, quite taken with herself and her experience, uh, bubbly, effervescent, bouncy, confident, uh—actually, I sort of had the same impression that you House Managers had of her when you met with her. You came out and said she was impressive, and so we come out about the same place.

Q. And did she relate to you the fact that she liked being an intern because it put her close to the President?

A. I have never seen a White House intern who did not like being a White House intern, and so her enthusiasm for being a White House intern was about like the enthusiasm of White House interns—they liked it.

She was not happy about not being there anymore—she did not like being at the Defense Department—and I think she actually had some desire to go back. But when she actually talked to me, she wanted to go to New York for a job in the private sector, and she thought that I could be helpful in that process.

Q. Did she make reference to someone in the White House being uncomfortable when she was an intern, and she thought that people did not want her there?

A. She felt unwanted—there is no question about that. As to who did not want her there and why they did not want her there, that was not my business.

Q. And she related that—

A. She talked about it.

Q.—experience or feeling to you?

A. Yes.

Q. Now, your meeting with Ms. Lewinsky was on December 11th, and I believe that Ms. Lewinsky has testified that she met with the President on December 5—excuse me, on December 6—at the White House and complained that her job search was not going anywhere, and the President then talked to Mr. Jordan.

Do you recall the President talking to you about that after that meeting?

A. I do not have a specific recollection of the President saying to me anything about having met with Ms. Lewinsky. The President has never told me that he met with Ms. Lewinsky, as best as I can recollect. I—I am aware that she was in a state of anxiety about going to work. She was in a state of anxiety in addition because her lease at Watergate, at the Watergate, was to expire December 31st. And there was a part of Ms. Lewinsky, I think, that thought that because she was coming to me, that she could come today and that she would have a job tomorrow. That is not an unusual misapprehension, and it's not limited to White House interns.

Q. I mentioned her meeting with the President on the same day, December 6th. I believe the record shows the President met with his lawyers and learned that Ms. Lewinsky was on the Jones witness list. Now, did you subsequently meet with the President on the next day, December 7th?

A. I may have met with the President. I'd have to—I mean, I'd have to look. I'd have to look. I don't know whether I did or not.

Q. If you would like to confer—I believe the record shows that, but I'd like to establish that through your testimony.

MS. WALDEN: Yes.

THE WITNESS: Yes.

BY MR. HUTCHINSON:

Q. All right. So you met with the President on December 7th. And was it the next day after that, December 8th, that Ms. Lewinsky called to set up the job meeting with you on December 11th?

A. I believe that is correct.

Q. And sometime after your meeting on December 11th with Ms. Lewinsky, did you have another conversation with the President?

A. Uh, you do understand that conversations between me and the President, uh, was not an unusual circumstance.

Q. And I understand that—

A. All right.

Q.—and so let me be more specific. I believe your previous testimony has been that sometime after the 11th, you spoke with the President about Ms. Lewinsky.

A. I stand on that testimony.

Q. All right. And so there's two conversations after the witness list came out—one that you had with the President on December 7th, and then a subsequent conversation with him after you met with Ms. Lewinsky on the 11th.

Now, in your subsequent conversation after the 11th, did you discuss with the President of the United States Monica Lewinsky, and if so, can you tell us what that discussion was?

A. If there was a discussion subsequent to Monica Lewinsky's visit to me on December 11th with the President of the United States, it was about the job search.

Q. All right. And during that, did he indicate that he knew about the fact that she had lost her job in the White House, and she wanted to get a job in New York?

A. He was aware that—he was obviously aware that she had lost her job in the White House, because she was working at the Pentagon. He was also aware that she wanted to work in New York, in the private sector, and understood that that is why she was having conversations with me. There is no doubt about that.

Q. And he thanked you for helping her?

A. There's no question about that, either.

Q. And on either of these conversations that I've referenced that you had with the President after the witness list came out, your conversation on December 7th, and your conversation sometime after the 11th, did the President tell you that Ms. Monica Lewinsky was on the witness list in the Jones case?

A. He did not.

Q. And did you consider this information to be important in your efforts to be helpful to Ms. Lewinsky?

A. I never thought about it.

Q. Was there a time that you became aware that Ms. Lewinsky had been subpoenaed to give a deposition in the Jones versus Clinton case?

A. On December 19th when she came to my office with the subpoena—I think it's the 19th.

Q. That's right. Now, you indicated you never thought about it, because of course, at that point, you didn't know that she was on the witness list, according to your testimony.

A. [Nodding head up and down.]

Q. Now, you said that she came to see you on December 19th—I'm sorry. I've been informed you didn't respond out loud, so—

A. Well, if you'd ask the question, I'd be happy to respond.

Q. I was afraid you would ask me to ask the question again.

Well, let's go to the December 19th meeting.

A. Fine.

Q. How did it come about that you met with Ms. Lewinsky on December 19th?

A. Ms. Lewinsky called me in a rather high emotional state and said that she needed to see me, and she came to see me.

Q. And she called you on the telephone on December 19th, in which she indicated she had received a subpoena?

A. That's right, and was emotional about it and asked, and so I said come over.

Q. And what was your reaction to her having received a subpoena in the Jones case?

A. Surprise, number one; number two, quite taken with her emotional state.

Q. And did you see that she had a problem?

A. She obviously had a problem—she thought—

THE VIDEOGRAPHER: We have to go off the record.

SENATOR THOMPSON: Off the record.  
[Recess due to power failure.]

THE VIDEOGRAPHER: We're going back on the record at 10:49 a.m.

SENATOR THOMPSON: All right, let the record reflect that we've been down for 20 to 25 minutes due to a power failure, but we are ready to proceed now, counsel.

MR. HUTCHINSON: Thank you, Senator Thompson.

And Mr. Jordan, before we go back to my line of questioning, I have been informed that we have that question in which we did not get an audible response, and so I'm going to ask the court reporter to read that question back.

[The court reporter read back the requested portion of the record.]

THE WITNESS: I did not know that she was on the witness list, Congressman. And let me say parenthetically here that our side had nothing to do with the power outage.

[Laughter.]

THE WITNESS: As desirable as that may have been.

[Laughter.]

BY MR. HUTCHINSON:

Q. Thank you, Mr. Jordan. And again, we're talking about the fact you never thought about the President not telling you that Ms. Lewinsky was on the witness list because you didn't know it at the time.

A. I—I did not know it.

Q. All right. Now, before we go back to December 19th, I've also been informed that I've been neglectful, and sometimes you will give a nod of the head, and I've not asked you to give an audible response. So I'm going to try to be mindful of that, but at the same time, Mr. Jordan, if you can try to give an audible response to a question rather than what we sometimes do in private conversation, which is a nod of the head. Fair enough?

A. I'm happy to comply.

Q. Now, we're talking about December 19th, that you had received a call from Monica Lewinsky; she had been subpoenaed in the Jones case. She was upset. You said, Come to my office.

Now, when she got to the office, I asked you, actually, before that, what was your reaction to her having this subpoena, and she had a problem because of the subpoena.

A. Yes.

Q. And I believe you previously indicated that any time a witness gets a subpoena, they've got a problem that they would likely need legal assistance.

A. That's been my experience.

Q. And in fact she did subsequently come to see you at the office on that December 19th, is that correct?

A. That's correct.

Q. And what happened at that meeting in your office with Ms. Lewinsky on the 19th?

A. She, uh, as I said, was quite emotional. She was—she was disturbed about the subpoena. She was disturbed about not having, in her words, heard from the President or talked to the President.

It was also in that meeting that it became clear to me that she—that her eyes were wide and that she, uh, that—let me—for lack of a better way to put it, that she had a "thing" for the President.

Q. And how long was that meeting?

A. I don't know, uh, but it's in the record.

MR. HUNDLEY: You testified 45 minutes.

THE WITNESS: Forty-five minutes. Thank you.

MR. HUTCHINSON: Thank you.

MR. HUNDLEY: Is that okay if I—

MR. HUTCHINSON: That's all right, and that's helpful, Mr. Hundley.

MR. HUNDLEY: Thank you. I'm trying to be helpful.

BY MR. HUTCHINSON:

Q. And during this meeting, did she in fact show you the subpoena that she had received in the Jones litigation?

A. I'm sure she showed me the subpoena.

Q. And the subpoena that was presented to you asked her to give a deposition, is that correct?

A. As I recollect.

Q. But did it also ask Ms. Lewinsky or direct her to produce certain documents and tangible objects?

A. I think, if I'm correct in my recollection, it asked that she produce gifts.

Q. Gifts, and some of those gifts were specifically enumerated.

A. I don't remember that. I do remember gifts.

Q. And did you discuss any of the items requested under the subpoena?

A. I did not. What I said to her was that she needed counsel.

Q. Now, just to help you in reference to your previous grand jury testimony of March 3, '98—and if you would like to refer to that, page 121, but I believe it was your testimony that you asked her if there had been any gifts after you looked at the subpoena.

A. I may have done that, and if I—if that's in my testimony, I stand by it.

Q. And did she—from your conversation with her, did you determine that in your opinion, there was a fascination on her part with the President?

A. No question about that.

Q. And I think you previously described it that she had a "thing" for the President?

A. "Thing," yes.

Q. And did you make any specific inquiry as to the nature of the relationship that she had with the President?

A. Yes. At some point during that conversation, I asked her directly if she had had sexual relationships with the President.

Q. And is this not an extraordinary question to ask a 24-year-old intern, whether she had sexual relations with the President of the United States?

A. Not if you see—not if you had witnessed her emotional state and this "thing," as I say. It was not.

Q. And her emotional state and what she expressed to you about her feelings for the President is what prompted you to ask that question?

A. That, plus the question of whether or not the President at the end of his term would leave the First Lady; and that was alarming and stunning to me.

Q. And she related that question to you in that meeting on December 19th?

A. That's correct.

Q. Now, going back to the question in which you asked her if she had had a sexual relationship with the President, what was her response?

A. No.

Q. And I'm sure that that was not an idle question on your part, and I presume that you needed to know the answer for some purpose.

A. I wanted to know the answer based on what I had seen in her expression; obviously, based on the fact that this was a subpoena about her relationship with the President.

Q. And so you felt like you needed to know the answer to that question to determine how you were going to handle the situation?

A. No. I thought it was a factual data that I needed to know, and I asked the question.

Q. And why did you need to know the answer to that question?

A. I am referring this lady, Ms. Lewinsky, to various companies for jobs, and it seemed to me that it was important for me to know in that process whether or not there had been something going on with the President based on what I saw and based on what I heard.

Q. And also based upon your years of experience—I mean your—

A. I don't understand that question.

Q. Well, you have children?

A. I have four children; six grandchildren.

Q. And you've raised kids, you've had a lot of experiences in life, and do you not apply that knowledge and experience and wisdom to circumstances such as this?

A. Yes. I've been around, and I've seen young people, both men and women, overly excited about older, mature, successful individuals, yes.

Q. Now, let me just go back as to what signals that you might have had at this particular point that there was a sexual relationship between Ms. Lewinsky and the President. Was one of those the fact that she indicated that she had a fascination with the President?

A. Yes.

Q. And did she relate that "He doesn't call me enough"?

A. Yes.

Q. And was the fact that there was an exchange of gifts a factor in your consideration?

A. Well, I was not aware that there had been an exchange of gifts. I thought it a tad unusual that there would be an exchange of gifts, uh, but it was just clear that there was a fixation by this young woman on the President of the United States.

Q. And was it also a factor that she had been issued a subpoena in a case that was rooted in sexual harassment?

A. Well, it certainly helped.

Q. And that was an ingredient that you factored in and decided this is a question that needed to be asked?

A. There's no question about that.

Q. Now, heretofore, the questions or the discussions with Ms. Lewinsky had simply been about a job?

A. Had been about a job.

Q. And I think you indicated that you didn't have to be an Einstein to know that this was a question that needed to be asked after what you learned on this meeting?

A. Yes, based on my own judgment, that is correct.

Q. Now, at this point, you're assisting the President in obtaining a job for a former intern, Monica Lewinsky?

A. Right.

Q. It comes to your attention from Ms. Lewinsky that she has a subpoena in a civil rights case against the President. And did this make you consider whether it was appropriate for you to continue seeking a job for Ms. Lewinsky?

A. Never gave it a thought.

Q. Despite the fact that you were seeking the job for Ms. Lewinsky at the request of the President when she is under subpoena in a case adverse to the President?

A. I—I did not give it a thought. I had committed that I was going to help her, and I was going to—and I kept my commitment.

Q. And so, however she would have answered that question, you would have still prevailed upon your friends in industry to get a job for her?

A. Congressman, that is a hypothetical question, and I'm not going to answer a hypothetical question.

Q. Well, I thought you had answered it before, but if—so you don't know whether it would have made a difference or not, then?

A. I asked her whether or not she had had sexual relationships with the President. Ms. Lewinsky told me no.

MR. HUNDLEY: I'd just like to interject. My recollection, Congressman, is that in the grand jury, he gave basically the same answer, that it was a hypothetical question, and that he really didn't know what he would have done had the answer been different. You could double-check it if you want, but I'm sure I'm right.

BY MR. HUTCHINSON:

Q. Okay, I'm not asking you a hypothetical question. I want to ask it in this phrase, in

this way. Did her answer make you consider whether it was appropriate for you to continue seeking a job for Ms. Lewinsky at the request of the President?

A. I did not see any reason why I should not continue to help her in her job search.

Q. Now, was the fact that she was under subpoena important information to you?

A. It was additional information, certainly.

Q. If you were trying to get Ms. Lewinsky a job, did you expect her to tell you if she had any reason to believe she might be a witness in the Jones case?

A. She did in fact tell me by showing me the subpoena. I had no expectations one way or the other.

Q. Well, I refer you to your grand jury testimony of March 3, '98 at page 98. Do you recall the answer: "I just think that as a matter of openness and full disclosure that she would have done that."

A. And she did.

Q. Precisely. She disclosed to you, of course, when she received the subpoena, and that's information that you expected to know and to be disclosed to you?

A. Fine.

Q. Is—

A. Yes. Fine.

Q. And in fact, if Ms. Currie—I'm talking about Betty Currie—if she had known that Ms. Lewinsky was under subpoena, you would have expected her to tell you that information as well since you were seeking employment for Ms. Lewinsky?

A. Well, it would have been fine had she told me. I do make a distinction between being a witness on the one hand and being a defendant in some sort of criminal action on the other. She was a witness in the civil case, and I don't believe witnesses in civil cases don't have a right for—to employment.

Q. Okay. I refer you to page 96 of your grand jury testimony, in which you said: "I believe that had Ms. Currie known, that she would have told me."

And the next question: "Let me ask the question again, though. Would you have expected her to tell you if she knew?"

And do you recall your answer?

A. I don't.

Q. "Yes, sure."

A. I stand by that answer.

Q. And so it's your testimony that if Ms. Currie had known that Ms. Lewinsky was under subpoena, you would have expected her to tell you that information?

A. It would have been helpful.

Q. And likewise, would you have expected the President to tell you if he had any reason to believe that Ms. Lewinsky would be called as a witness in the Paula Jones case?

A. That would have been helpful, too.

Q. And that was your expectation, that he would have done that in your conversations?

A. It—it would certainly have been helpful, but it would not have changed my mind.

Q. Well, being helpful and that being your expectation is a little bit different, and so I want to go back again to your testimony on March 3, page 96, when the question is asked to you—question: "If the President had any reason to believe that Ms. Lewinsky could be called as a witness in the Paula Jones case, would you have expected him to tell you that when you spoke with him between the 11th and the 19th about her?"

And your answer: "And I think he would have."

A. My answer was yes in the grand jury testimony, and my answer is yes today.

Q. All right. So it would have been helpful, and it was something you would have expected?

A. Yes.

Q. And yet, according to your testimony, the President did not so advise you of that

fact in the conversations that he had with you on December 7th and December 11th after he learned that Ms. Lewinsky was on the witness list?

A. As I testified—

MR. KENDALL: Objection. Misstates the record with regard to December 11th.

MR. HUTCHINSON: I—I will restate the question. I believe it accurately reflects the record, and I'll ask the question.

BY MR. HUTCHINSON:

Q. And yet, according to your testimony, the President did not so advise you of the fact that Ms. Lewinsky was on the witness list despite the fact that he had conversations with you on two occasions, on December 7th and December 11th?

A. I have no recollection of the President telling me about the witness list.

Q. And during this meeting with Ms. Lewinsky on the 11th, did you take some action as a result of what she told you?

A. On the 11th or the 18th?

Q. Excuse me. I'm sorry. Let me go to the 19th.

A. Nineteenth.

Q. Thank you for that correction.

Did you refer her to an attorney?

A. Yes, I did.

Q. Okay, and who was the attorney that you referred her to?

A. Frank Carter, a very able local attorney here.

Q. And did you give her two or three attorneys to select from, or did you just give her one recommendation?

A. I made a recommendation of Frank Carter. That was the only recommendation.

Q. Now, let me go to I believe it's the next three exhibits that are in front of you, if you'd just turn that first page, and I believe they are marked 29, 31, 32 and 33. And these are, I believe, exhibits that you have seen before and are summaries and documents relating to telephone conversations on this particular day of December 19th.

[Witness perusing documents.]

SENATOR DODD: How are these going to be marked—as Jordan Deposition Exhibits—

MR. HUTCHINSON: These should be marked as Exhibits 2, 3, and 4.

SENATOR DODD: Okay.

MR. KENDALL: Excuse me, Mr. Manager. Are you offering these in evidence?

MR. HUTCHINSON: Not at this time.

I guess it's 2, 3, 4 and 5.

SENATOR THOMPSON: Are we referring to the next four exhibits in the package here?

MR. HUTCHINSON: Yes, sir.

SENATOR THOMPSON: Well, we'll just identify them one at a time, and we'll—

MR. HUTCHINSON: All right.

BY MR. HUTCHINSON:

Q. Let's go to Exhibit 29 as it's marked, but for our purpose, we're going to refer to it as Deposition Exhibit 2.

SENATOR THOMPSON: All right. For identification for right now, we'll call that Jordan Exhibit Number 2 for identification, which is marked as, I assume, Grand Jury Exhibit Number 29.

[Jordan Deposition Exhibit No. 2 marked for identification.]

BY MR. HUTCHINSON:

Q. And from this record, would you agree that you received a call from Ms. Lewinsky at 1:47 p.m.?

A. For 11 seconds.

Q. All right. And subsequent to that, you placed a call to talk to the President at 3:51 p.m. and talked to Deborah Schiff?

A. Yes.

Q. And what was the purpose of that call to Deborah Schiff?

A. I—I'm certain that I did not call Deborah Schiff. I had no reason to call Deborah Schiff. My suspicion was that if I in fact

called 1414, that somehow Deborah Schiff was answering the telephone.

Q. Were you trying to get hold of the President?

A. I think maybe I was.

Q. All right. And then, subsequent to that, Ms. Lewinsky arrived in your office at 4:47 p.m.—and I believe that would be reflected on Exhibit 3—excuse me—Exhibit 4.

MR. HUNDLEY: Four.

THE WITNESS: Yes.

BY MR. HUTCHINSON:

Q. And does it also reflect, going back to the call records, that you talked to the President during the course of your meeting with Ms. Lewinsky at approximately 5:01 p.m.?

A. I beg your pardon?

MR. HUTCHINSON: This would be Exhibit 5.

SENATOR THOMPSON: All right. Let's mark these for identification purposes.

We have already identified Deposition Exhibit Number 29 as Exhibit Number 2 for identification in Mr. Jordan's deposition.

The next one would be Grand Jury Exhibit Number 31, and we will mark that as Exhibit Number 3 for identification purposes. Following that will be Grand Jury Exhibit Number 32, that we will identify as Exhibit Number 4 to Mr. Jordan's deposition for identification purposes; and Grand Jury Exhibit Number 33 will be Exhibit Number 5 to Mr. Jordan's deposition for identification purposes.

Now, do we need to go any further at this time?

MR. HUTCHINSON: No. Thank you.

SENATOR THOMPSON: All right. [Jordan Deposition Exhibit Nos. 3, 4 and 5 marked for identification.]

BY MR. HUTCHINSON:

Q. Mr. Jordan—

A. Yes.

Q.—under Exhibit—

A. Yes.

Q.—according to these records, specifically Exhibit 5, does it reflect that you talked to the President during the course of your meeting with Ms. Lewinsky at approximately 5:01 p.m.?

MR. KENDALL: Object to the form of the question.

MR. HUTCHINSON: You may answer.

THE WITNESS: I'm confused.

MR. HUTCHINSON: There's an objection as to the form of the question.

THE WITNESS: Oh.

SENATOR THOMPSON: We can resolve it.

MR. KENDALL: The question was do these records indicate this. If he offers Number 2, I'm going to object to it. It's not the best evidence. It's a chart. I don't know who prepared it—

SENATOR THOMPSON: He's referring to 5 now, I believe, isn't he?

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: I believe this had to do with 5.

MR. HUTCHINSON: All right.

THE WITNESS: Would you ask your question?

BY MR. HUTCHINSON:

Q. Mr. Jordan, I'm simply trying to establish, and using Exhibit 5 to refresh your recollection—

MR. KENDALL: I withdraw the objection, I withdraw the objection.

SENATOR THOMPSON: All right, sir; very fine.

MR. HUTCHINSON: Thank you.

BY MR. HUTCHINSON:

Q.—that this record, Exhibit 5, reflects that you talked to the President during the course of your meeting with Ms. Lewinsky at approximately 5:01 p.m.

A. Yes. I—I have never had a conversation with the President while Ms. Lewinsky was

present. The wave-in sheet from my office said that she came in at 5:47—

Q. Four forty-seven.

A.—4:47. She may have been in the reception area, or she may have been outside my office, but Ms. Lewinsky was not in my office during the time that I had a conversation with the President.

Q. And the other alternative would be that she came into your office, and then you excused her while you received a call from the President?

A. That's a possibility, too—

Q. All right.

A.—but she was not present in my office proper during the time that I was having a conversation with the President.

Q. Absolutely, and that is clear.

Now, because we got a little bogged down in the records, let me just go back for a moment. Is it your understanding, based upon the records and recollection, that you received a call from Ms. Lewinsky about 1:47; you talked to Deborah Schiff trying to get hold of the President about 3:51 that afternoon; Ms. Lewinsky arrived at about 4:47 p.m.

A. Yes.

Q. Am I correct so far?

A. Yes.

Q. And then you received a call from the President at about 5:01 p.m.?

A. That's correct.

MR. HUTCHINSON: I want to say "Your Honor"—I've wanting to do this all day. Senator—I would offer these Exhibits 2, 3, 4 and 5 at this time.

MR. KENDALL: I would object to the admission of Exhibit Number 2.

SENATOR THOMPSON: Mr. Hutchinson, could you identify what this exhibit is from?

MR. HUTCHINSON: Well, this exhibit is a summary exhibited based upon the original records that establish this. Now, we've established it clearly through the testimony, so it's not of earth-shattering significance whether this is in the record or not, because the witness has established it.

SENATOR THOMPSON: All right. But this is a compilation of what you contend—

MR. HUTCHINSON: Yes.

SENATOR THOMPSON:—is otherwise in the record?

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: Counsel, do we really have a problem with that?

MR. KENDALL: Senator Thompson, I don't know who prepared this or what records it's based on. I have not objected to any of the original records, and I'll continue my objection.

SENATOR THOMPSON: I think in light of that we will sustain it, if Mr. Hutchinson thinks it's otherwise in the record anyway, and not make an issue out of that.

So we will, then, make as a part of the record Exhibits Numbers 3, 4 and 5 that have previously been introduced for identification purposes; they will now be made a part of the record.

MR. HUTCHINSON: Thank you, Senator.

[Jordan Deposition Exhibit Nos. 3, 4 and 5 received in evidence.]

BY MR. HUTCHINSON:

Q. Now, Mr. Jordan, you indicated you had this conversation with the President at about 5:01 p.m. out of the presence of Ms. Lewinsky. Now, during this conversation with the President, what did you tell the President in that conversation?

A. That Lewinsky—I'm sure I told him that Ms. Lewinsky was in my office, in the reception area, that she had a subpoena and that I was going to visit with her.

Q. And did you advise the President as well that you were going to recommend Frank Carter as an attorney?

A. I may have.

Q. And why was it necessary to tell the President these facts?

A. I don't know why it was not unnecessary to tell him these facts. I was keeping him informed about what was going on, and so I told him.

Q. Why did you make the judgment that you should call the President and advise him of these facts?

A. I just thought he ought to know. He was interested in it—he was obviously interested in it—and I felt some responsibility to tell him, and I did.

Q. All right. And what was the President's response?

A. He said thank you.

Q. Subsequent to your conversation with the President about Monica Lewinsky, did you advise Ms. Lewinsky of this conversation with the President?

A. I doubt it.

Q. And if she indicates that she was not aware of that conversation, would you dispute her testimony in that regard?

A. I would not.

Q. And you say that you doubt it. Was there a reason that you would not disclose to her the fact that you talked to the President when she was the subject of that conversation?

A. No. I—I didn't feel any particular obligation to tell her or not to tell her, but I did not tell her.

Q. Now, we have discussed to a limited extent the gifts that were mentioned in the subpoena in this discussion that you had with Ms. Lewinsky. Did she in fact tell you about the gifts she had received from the President?

A. I think she told me that she had received gifts from the President.

Q. Did she also indicate that there had been an exchange of gifts?

A. She did.

Q. And did you think that it was somewhat unusual that there had been an exchange of gifts?

A. Uh, a tad unusual, I thought.

Q. These—

A. Which again occasioned the question.

Q. Pardon?

A. Which again occasioned the ultimate question.

Q. On—on whether there was a sexual relationship?

A. That is correct.

Q. And so that was a significant fact in determining whether that question should be asked?

A. It was an additional fact.

Q. Now, the subpoena also references "documents constituting or containing communications between you"—which would have been Ms. Lewinsky under the subpoena—"and the Defendant Clinton, including letters, cards, notes, et cetera."

Did you ask Ms. Lewinsky at all whether there were any kinds of cards or communications between them?

A. Uh, I did not, but she may have volunteered that.

Q. And did she tell you about telephone conversations with the President?

A. She did tell me that she and the President talked on the telephone.

Q. And did she express it in a way that it was frustrating because the President didn't call her sufficiently?

A. Well, that—that is correct, and she was disappointed, uh, and disapproving of the fact that she was not hearing from the President of the United States on a regular basis.

Q. During this conversation with Ms. Lewinsky, she also made reference to the First Lady?

A. Yes.

Q. And that was another question of concern when she asked if you thought that the

President would leave the First Lady at the end of his term?

A. That is correct.

Q. And what was your reaction to this statement?

A. My reaction to the statement after I got over it was that—no way.

Q. Did it send off alarm bells in your mind as to her relationship with the President?

A. I think it's safe to say that she was not happy.

Q. You're speaking of Ms. Lewinsky?

A. That's the only person we're talking about, Congressman.

Q. Now, based upon all of this, was it your conclusion the subpoena meant trouble?

A. Beg your pardon?

Q. Based upon all of these facts and your conversation with Ms. Lewinsky, was it your conclusion that the subpoena meant trouble?

A. Well, I always, based on my experience with the grand jury, believe that subpoenas are trouble.

Q. I think you've used the language, "ipse facto" meant trouble?

A. Yes, yes, right.

Q. Now, subsequent to your meeting with Ms. Lewinsky on this occasion, did you in fact set up an appointment with Mr. Frank Carter?

A. Yes—for the 22nd, I believe.

Q. Which I believe would have been the first part of the next week?

A. That's right.

Q. And still on December 19th, after your meeting with Ms. Lewinsky, did you subsequently see the President of the United States later that evening?

A. I did.

Q. And is this when you went to the White House and saw the President?

A. Yes.

Q. At the time that Ms. Lewinsky came to see you on December 19th, did you have any plans to attend any social function at the White House that evening?

A. I did not.

Q. And in fact there was a social invitation that you had at the White House that you declined?

A. I had—I had declined it; that's right.

Q. And subsequent to Ms. Lewinsky visiting you, did you change your mind and go see the President that evening?

A. After the—a social engagement that Mrs. Jordan and I had, we went to the White House for two reasons. We went to the White House to see some friends who were there, two of whom were staying in the White House; and secondly, I wanted to have a conversation with the President.

Q. And this conversation that you wanted to have with the President was one that you wanted to have with him alone?

A. That is correct.

Q. And did you let him know in advance that you were coming and wanted to talk to him?

A. I told him I would see him sometime that night after dinner.

Q. Did you tell him why you wanted to see him?

A. No.

Q. Now, was this—once you told him that you wanted to see him, did it occur the same time that you talked to him while Ms. Lewinsky was waiting outside?

A. It could be. I made it clear that I would come by after dinner, and he said fine.

Q. Now, let me backtrack for just a moment, because whenever you talked to the President, Ms. Lewinsky was not inside the room—

A. That's correct.

Q.—and therefore, you did not know the details about her questions on the President might leave the First Lady and those questions that set off all of these alarm bells.

A. [Nodding head up and down.]

Q. And so you were having—is the answer yes?

A. That's correct.

Q. And so you were having this discussion with the President not knowing the extent of Ms. Lewinsky's fixation?

A. Uh—

Q. Is that correct?

A. Correct.

Q. And, regardless, you wanted to see the President that night, and so you went to see him. And was he expecting you?

A. I believe he was.

Q. And did you have a conversation with him alone?

A. I did.

Q. No one else around?

A. No one else around.

Q. And I know that's a redundant question.

A. It's okay.

Q. Now, would you describe your conversation with the President?

A. We were upstairs, uh, in the White House. Mrs. Jordan—we came in by way of the Southwest Gate into the Diplomatic Entrance—we left the car there. I took the elevator up to the residence, and Mrs. Jordan went and visited at the party. And the President was already upstairs—I had ascertained that from the usher—and I went up, and I raised with him the whole question of Monica Lewinsky and asked him directly if he had had sexual relations with Monica Lewinsky, and the President said, "No, never."

Q. All right. Now, during that conversation, did you tell the President again that Monica Lewinsky had been subpoenaed?

A. Well, we had established that.

Q. All right. And did you tell him that you were concerned about her fascination?

A. I did.

Q. And did you describe her as being emotional in your meeting that day?

A. I did.

Q. And did you relate to the President that Ms. Lewinsky asked about whether he was going to leave the First Lady at the end of the term?

A. I did.

Q. And as—and then, you concluded that with the question as to whether he had had sexual relations with Ms. Lewinsky?

A. And he said he had not, and I was satisfied—end of conversation.

Q. Now, once again, just as I asked the question in reference to Ms. Lewinsky, it appears to me that this is an extraordinary question to ask the President of the United States. What led you to ask this question to the President?

A. Well, first of all, I'm asking the question of my friend who happens to be the President of the United States.

Q. And did you expect your friend, the President of the United States, to give you a truthful answer?

A. I did.

Q. Did you rely upon the President's answer in your decision to continue your efforts to seek Ms. Lewinsky a job?

A. I believed him, and I continued to do what I had been asked to do.

Q. Well, my question was more did you rely upon the President's answer in your decision to continue your efforts to seek Ms. Lewinsky a job.

A. I did not rely on his answer. I was going to pursue the job in any event. But I got the answer to the question that I had asked Ms. Lewinsky earlier from her, and I got the answer from him that night as to the sexual relationships, and he said no.

Q. It would appear to me that there's two options. One, you asked the question in terms of idle conversation, and that does not seem logical in view of the fact that you

made a point to go and visit the President about this alone.

A. Yes. I never said that—I never talked about options. I told you I went to ask him that question.

Q. Well, was it idle conversation, or was there a purpose in you asking him that question?

A. It obviously, Congressman, was not idle conversation.

Q. All right.

A. For him nor for me.

Q. There was a purpose in it—and would you describe it as being important, the question that you asked to him?

A. I wanted to satisfy myself, based on my visit with her, that there had been no sexual relationships, and he said no, as she had said no.

Q. And why was it important to you to satisfy yourself on that particular point?

A. I had seen this young lady, and I had seen her reaction, uh, and it raised a presumption, uh, and I wanted to satisfy myself, as I had done with her, that there had been no sexual relationship between them.

Q. If you had—

A. And I did satisfy myself.

Q. And if you had—well, let me rephrase it. If you believed the presumption, or if you had evidence that Ms. Lewinsky did have sexual relations with the President, would this have affected your decision to act in the President's interest in locating her a job when she had been subpoenaed in a case adverse to the President?

A. I do not think it would have affected my decision.

Q. Now, you mentioned that you set up an appointment for Ms. Lewinsky at the office of Frank Carter for December 22nd.

A. Right.

Q. Prior to that appointment with Mr. Carter, did Ms. Lewinsky come to see you in your office?

A. I took Ms. Lewinsky from my office, in my Akin Gump, chauffeur-driven car, to Frank Carter's office.

Q. And when she arrived at your office, did you have a discussion with her?

A. I think I got my coat, she got her—she had on her coat—and we left.

Q. While in your office before going to see Mr. Carter, did Ms. Lewinsky ask about her job?

A. Every conversation that I had with Ms. Lewinsky had at some point to do with pending employment.

Q. And I take that as a "yes" answer, but I would also refer you to page 184 of your previous testimony in which that answer was "yes."

A. Yes.

Q. And so prior to going to see Mr. Carter, you met with Ms. Lewinsky and—where she asked about her job?

A. Well, as I'm putting on my coat, I mean, we did not sit down and have a conference. We had an appointment.

Q. Now, you last testified before the grand jury in June of 1998, and you have not had the opportunity to address some issues that Ms. Lewinsky raised when she testified before the grand jury in August of 1998, and I would like to—there will be a number of questions as we go through this today relating to some things that she testified to, because it's important that we hear your responses to it, and so I'd like to ask you about a couple of these particular areas.

During this meeting—and you say it was a short meeting, that you really didn't sit down—but during this time, did Ms. Lewinsky ask if you had told the President that she had been subpoenaed in the Jones case?

A. She may have, and—and if she did, I answered yes.

Q. Even though you did not tell her about the conversation on December 19th that you had with the President in which you told the President she had been subpoenaed?

A. If she had asked, I would have told her.

Q. And did Ms. Lewinsky show you any gifts that she was bringing to Mr. Frank Carter?

A. Yeah—I'm not aware that Ms. Lewinsky showed me any gifts. I have no—I have no recollection of her having shown me gifts given her by the President. And my best recollection is that she came to my office, I got myself together, and that we left. I have no recollection of her showing me gifts given her by the President.

Q. Would you dispute if she in fact had gifts with her on that occasion?

A. I don't know whether she had gifts with her or not. I do have—I have no recollection of her showing me, saying, "This is a gift given me by the President of the United States."

Q. And if she testifies that she showed you the gifts she was bringing Mr. Carter, you would dispute that testimony?

A. I have not any recollection of her showing me any gifts.

Q. And I take that as not denying it—

MR. KENDALL: Objection to form.

BY MR. HUTCHINSON:

Q.—but that you have no recollection.

A. Uh, I don't know how else to say it to you, Mr. Congressman.

Q. Well—

A. I have no recollection of Ms. Lewinsky coming to my office and showing me gifts given her by the President of the United States.

Q. Let me go on. Did Ms. Lewinsky tell you that she and the President had had phone sex?

A. I think Ms.—I know Ms. Lewinsky told me about, uh, telephone conversations with the President. If Ms. Lewinsky had told me something about phone sex, I think I would have remembered that.

Q. And therefore, if she testifies that she told you that Ms. Lewinsky and the President had had phone sex, then you'd simply deny her testimony in that regard?

A. I—

MR. KENDALL: Object to the form.

THE WITNESS: I have no recollection, Congressman, of Ms. Lewinsky telling me about phone sex—but given my age, I would probably have been interested in what that was all about.

SENATOR THOMPSON: We'll overrule the objection. It's a leading question, but I think that it will be permissible for these purposes.

MR. HUTCHINSON: It's my understanding, Senator, that under the Senate rule, that the witness would be considered an adverse witness.

SENATOR THOMPSON: That's correct.

BY MR. HUTCHINSON:

Q. Well, I don't mean to engage in disputes over fine points, but I guess—

A. Well, you obviously, Congressman, have Ms. Lewinsky saying one thing and me saying another. I stand by what I said.

Q. Which is that you have no recollection of that discussion taking place.

A. But I do think that I would have remembered it had it happened.

Q. All right. Now, after your brief encounter or meeting with Ms. Lewinsky in your office, did you take Ms. Lewinsky in your vehicle to Mr. Carter's office?

A. Yes.

Q. And when you arrived at Mr. Carter's office, did you meet with Mr. Carter in advance, while Ms. Lewinsky waited outside?

A. I said a brief hello to him. We talked about lunch. I never took off my coat. I did take off my hat, because it was inside. And I left them, and I got a piece of his candy.

Q. Now, I was looking at the testimony of Mr. Carter. Now, do you recall a meeting with Mr. Carter in his office while Ms. Lewinsky waited outside, even if it might have been a brief meeting?

A. Yes, I think maybe I went in. I just don't know—I was there for a very short time.

Q. Did you explain to Mr. Carter that you were seeking Ms. Lewinsky a job at the request of the President?

A. No, I did not, but I think he knew that.

Q. And why do you think he knew that?

A. I must have told him.

Q. So at some point, you believe that you told Mr. Carter that you were seeking Ms. Lewinsky a job at the request of the President?

A. I think I may have done that.

Q. Now, you have referred other clients to Mr. Carter during your course of practice here in Washington, D.C.?

A. Yes, I have.

Q. About how many have you referred to him?

A. Oh, I don't know. Maggie Williams is one client that I—I remember very definitely.

I like Frank Carter a lot. He's a very able young lawyer. He's a first-class person, a first-class lawyer, and he's one of my new acquaintances amongst lawyers in town, and I like being around him. We have lunch, and he's a friend.

Q. And is it true, though, that when you've referred other clients to Mr. Carter that you never personally delivered and presented that client to him in his office?

A. But I delivered Maggie Williams to him in my office. I had Maggie Williams to come to my office, and it was in my office that I introduced, uh, Maggie Williams to Mr. Carter, and she chose other counsel. I would have happily taken Maggie Williams to his office.

Q. But this is the only occasion that you took your Akin, Gump-chauffeured vehicle and delivered the client to Mr. Carter in his office?

A. It was.

Q. Now, we're not going to go through, probably to your relief, each day's phone calls, but is it safe to say that Ms. Lewinsky called you regularly, both keeping you posted on her interviews and contacts, but also asking you what you knew about her job desires?

A. That is correct.

Q. And it is also true that during this process, you kept the President informed?

A. That, too, is correct.

Q. And did the President ever give you any other instruction other than to find Ms. Lewinsky a job in New York?

A. I do not view the President as giving me instructions. The President is a friend of mine, and I don't believe friends instruct friends. Our friendship is one of parity and equality.

Q. Let me rephrase it, and that's—

A. Thank you.

Q. That's a fair comment that you certainly made.

Did you ever receive any other request from the President in reference to your dealing with Monica Lewinsky other than the request to find her a job in New York?

A. That is correct.

MR. HUTCHINSON: I've been informed that there's a few minutes left on the tape. Do you want to break?

THE VIDEOGRAPHER: Yes.

SENATOR THOMPSON: All right. Let's take a 5-minute break at this point.

Also, if it's not objectionable to anyone, let's move a little closer to 1 o'clock, after all, for lunch, if that's okay. We have a conference that that will coincide with a little

better, but for right now, let's take a 5-minute break.

SENATOR DODD: Just before we do, just to make it—and the admonition about these—these—this matter being in—confidential.

SENATOR THOMPSON: Right.

SENATOR DODD: And I'm going to restate that over and over again today, so that people understand the rules under which we're operating here, and this is confidential and no one is to reveal anything they hear, except to the people that was listed in Senator Thompson's opening remarks.

SENATOR THOMPSON: Absolutely.

We'll be in recess.

THE VIDEOGRAPHER: This marks the end of Videotape Number 1 in the deposition of Vernon E. Jordan, Jr. We are going off the record at 11:35 a.m.

[Recess.]

THE VIDEOGRAPHER: This marks the beginning of Videotape Number 2 in the deposition of Vernon E. Jordan, Jr. We are going back on the record at 11:49 a.m.

SENATOR THOMPSON: All right, Mr. Hutchinson, and you have consumed an hour and 40 minutes.

MR. HUTCHINSON: Thank you, Senator Thompson.

BY MR. HUTCHINSON:

Q. Mr. Jordan, I was reminded that the last question I asked you received an answer that I didn't, at least, understand, so I'm going to reask that question, and the question that I had asked, I believe, was: Did you ever receive any other request from the President in reference to your dealings with Ms. Lewinsky other than the request to find her a job in New York? And I think your answer was: That's correct. And that confuses me a little bit, so let me rephrase the question.

Did you ever receive—not rephrase it, but restate the question. Did you ever receive any other request from the President in reference to your dealings with Monica Lewinsky other than the request to find her a job in New York?

A. I did not.

Q. Now, let me go to December 31, 1997, in reference to another issue that Ms. Lewinsky has testified about in her August grand jury appearance and in which you have not had the opportunity to discuss in detail.

Ms. Lewinsky has testified that she met you for breakfast at the Park Hyatt—

MR. HUNDLEY: Excuse me. I think you misspoke yourself. You said '97.

MR. HUTCHINSON: This is '97, right?

MR. HUNDLEY: It is? I apologize.

MR. HUTCHINSON: Okay. Thank you, Mr. Hundley. The years are confusing, but I believe this is December 31, 1997.

BY MR. HUTCHINSON:

Q. And Ms. Lewinsky has testified that she met you for breakfast at the Park Hyatt, and even specifically as to what she had for breakfast on that particular occasion when she met with you and as to the conversation that she had.

And I want to show you, in order to hopefully refresh your recollection, an exhibit which I'm going to mark as the next exhibit number, which will be 6, I believe?

SENATOR THOMPSON: Yes. What—

MR. HUTCHINSON: And it's in the binder as Exhibit 42. It is not there, but it is in the binder as Exhibit 42.

SENATOR THOMPSON: Let's take a moment so everyone can refer to that.

BY MR. HUTCHINSON:

Q. Have you located that, Mr. Jordan?

A. [Nodding head up and down.]

Q. And this receipt, is this a receipt for a charge that you had at the Park Hyatt on December 31st?

A. That's an American Express receipt for breakfast.

Q. And is the date December 31st?

A. That is correct.

Q. And does it reflect the items that were consumed at that breakfast?

A. It reflects the items that were paid for at that breakfast.

[Laughter.]

BY MR. HUTCHINSON:

Q. Does it appear to you that this is a breakfast for two people?

A. The price suggests that it was a breakfast for two people.

Q. All right. And the fact that there's two coffees, there is one omelet, one English muffin, one hot cereal, and can you identify from that what you ordinarily eat at breakfast?

A. What I ordinarily eat at breakfast varies. This morning, it was fish and grits.

Q. All right. Now, Ms. Lewinsky in her testimony, I think, referenced as to what she ate, which I believe would be confirmed in this record.

Do you recall a meeting with Ms. Lewinsky at the Park Hyatt on December 31st of—

A. If you—

Q.—1997?

A. If you would refer to my testimony before the grand jury when asked about a breakfast with Ms. Lewinsky on December 31st, I testified that I did not have breakfast with Ms. Lewinsky on December 31st because I did not remember having had breakfast with Ms. Lewinsky on December 31st. It was not on my calendar. It was New Year's Eve. I have breakfast at the Park Hyatt Hotel three or four times a week if I am in town, and so I really did not remember having breakfast with Ms. Lewinsky. And that's an honest statement, I did not remember, and I told that to the grand jury.

It is clear, based on the evidence here, that I was at the Park Hyatt on December 31st. So I do not deny, despite my testimony before the grand jury, that on December 31st that I was there with Ms. Lewinsky, but I did testify before the grand jury that I did not remember having a breakfast with her on that date, and that was the truth.

My recollection has subsequently been refreshed, and—and so it is—it is undeniable that there was a breakfast in my usual breakfast place, in the corner at the Park Hyatt. I'm there all the time.

Q. All right. And so—and that would be with Ms. Lewinsky?

A. Yes.

Q. And so the—so your memory has been refreshed, and I appreciate the statement that you just made.

Let me go to that meeting with her and ask whether during this occasion that you met her for breakfast that there was a discussion about Ms. Linda Tripp and Ms. Lewinsky's relationship with her and conversations with her.

A. I also testified in my grand jury testimony that I never heard the name "Linda Tripp" until such time that I saw the Drudge Report. I did not have a conversation with Ms. Lewinsky at the breakfast at the Park Hyatt Hotel on December 31st about Linda Tripp. I never heard the name "Linda Tripp," knew nothing about Linda Tripp until I read the Drudge Report.

Q. All right. And do you recall a discussion with Ms. Lewinsky at the Park Hyatt on this occasion in which there were notes discussed that she had written to the President?

A. I am certain that Ms. Lewinsky talked to me about notes.

Q. On this occasion?

A. Yes.

Q. And would these have been notes that she would have sent to the President?

A. I think that there was—these notes had to do with correspondence between Ms. Lewinsky and the President.

Q. And would have she mentioned the retention or copies of some of that correspondence on her computer in her apartment?

A. She may have done that.

Q. And did you ask her a question, were these notes from the President to you?

A. I understood from our conversation that she and the President had correspondence that went back and forth.

Q. And did you make a statement to her, "Go home and make sure they're not there"?

A. Mr. Hutchinson, I'm a lawyer and I'm a loyal friend, but I'm not a fool, and the notion that I would suggest to anybody that they destroy anything just defies anything that I know about myself. So the notion that I said to her go home and destroy notes is ridiculous.

Q. Well, I appreciate that reminder of ethical responsibilities. It was—

A. No, it had nothing to do with ethics, as much as it's just good common sense, mother wit. You remember that in the South.

Q. And so—and let me read a statement that she made to the grand jury on August 6th, 1998. This is the testimony of Ms. Lewinsky, referring to a conversation with you at the Park Hyatt that, "She," referring to Linda Tripp, "was my friend. I didn't really trust her. I used to trust her, but I didn't trust her anymore, and I was a little bit concerned because she had spent the night at my home a few times, and I thought—I told Mr. Jordan. I said, 'Well, maybe she's heard some'—you know, I mean, maybe she saw some notes lying around, and Mr. Jordan said, 'Notes from the President to you?,' and I said, 'No. Notes from me to the President,' and he said, 'Go home and make sure they're not there.'"

A. And, Mr. Hutchinson, I'm saying to you that I never heard the name "Linda Tripp" until I read the Judge-Drudge Report.

Secondly, let me say to you that I, too, have read Ms. Lewinsky's testimony about that breakfast, and I can say to you, without fear of contradiction on my part, maybe on her part, that the notion that I told her to go home and destroy notes is just out of the question.

Q. And so this is not a matter of you not recalling whether that occurred or not—

A. I am telling you—

Q. Well, let me—

A.—emphatically—

Q. Mr. Jordan, let me finish the question.

A. Okay, all right.

Q. Please, sir.

A. Okay.

Q. It's sort of important for the record.

This is a statement by Ms. Lewinsky that you flatly and categorically deny?

A. Absolutely.

Q. Now, you talked about "mother wit," I think it was; that you knew at the time that you had this discussion with Ms. Lewinsky that these notes would have been covered by the subpoena based upon your discussion of that on December 19th?

A. Ask that question again.

Q. All right. This is a meeting on December 31st at the Park Hyatt.

A. Right.

Q. A discussion about the notes, correspondence between Ms. Lewinsky and the President.

A. Right.

Q. You are aware, based upon your discussion of the subpoena on December 19th, that these were covered under the subpoena?

A. Yes.

Q. And did you tell Ms. Lewinsky that you need to make sure you tell your attorney, Mr. Carter, and that these are turned over under the subpoena?

A. What I did not tell her was to destroy the notes. Whether I told her to give them to Mr. Carter or not, I have no recollection of that.

Q. But you knew at the time that these notes were a matter of evidence?

A. I think that's a valid assumption.

Q. But you knew that?

A. It's a valid assumption.

Q. Now, during this meeting at the Park Hyatt, did Ms. Lewinsky also make it clear to you that she was in love with the President?

A. That, I had already concluded.

Q. And if Ms.—now, was there anything else at the Park Hyatt at this meeting on December 31st that you recall discussing with Ms. Lewinsky?

A. Job, work, in New York, in the private sector.

Q. And that was the—was this a meeting that was set up at her request or your request?

A. I'm certain it was at her request. I am fairly certain that I did not call Ms. Lewinsky and say will you join me at the Park Hyatt for breakfast on December 31st, on New Year's Eve.

Q. All right. And did you also talk about her situation under the subpoena and the fact that she was going to have to give testimony, it looked like?

A. I am not Ms. Lewinsky's lawyer, and I did not view it as my responsibility to give Ms. Lewinsky advice and counsel.

I had found her very able, competent counsel.

Q. Respectfully, I am simply asking whether that was discussed.

A. And I am simply saying to you, I did not provide her legal counsel.

Q. Okay. Was it discussed in—not in terms of legal representation, but in terms of Mr. Jordan to Monica Lewinsky about any emotional concerns she might have about pending testimony?

A. I have no recollection of talking to her about pending testimony.

Q. Fair enough. Now, let's go back to Mr. Carter's representation of Ms. Lewinsky that you referred to. Were you aware that Mr. Carter was preparing an affidavit for Ms. Lewinsky to sign in the Jones case?

A. Yes.

Q. And on or about the 6th or 7th of January, did you become aware that she in fact had signed the affidavit and that Mr. Carter had filed a motion to quash her subpoena in the case?

A. She told me that she had signed the affidavit.

Q. And did in fact Mr. Carter also relate to you that that had occurred?

A. Yes.

Q. And I think you made a statement in your March grand jury testimony that there was no reason for accountability, that he reassured me that he had things under control?

A. That is correct. I stand by that testimony.

Q. And now, if you would, look at the next exhibit, which is in that stapled bunch of exhibits that have been provided to you.

MR. HUTCHINSON: This will be Exhibit No. 7, we'll mark for your deposition.

And, Senator, did we put Exhibit No. 6 in?

SENATOR THOMPSON: No, we didn't.

MR. HUTCHINSON: I would like to offer that as an exhibit to this deposition.

SENATOR THOMPSON: It will be made a part of the record.

[Jordan Deposition Exhibit Nos. 6 and 7 marked for identification.]

[Witness perusing document.]

SENATOR DODD: That is Number 6?

MR. HUTCHINSON: Six. That's the Park Hyatt.

SENATOR DODD: Oh, that is going to be Number 6, the Park Hyatt, not the—

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: Now, what is 7?

MR. HUTCHINSON: Now, 7 is the affidavit of Jane Doe Number 6, which in the—I think everybody has found that in the book.

SENATOR THOMPSON: What is the grand jury number?

MR. HUTCHINSON: It's 85, the grand jury number.

This will be Deposition Exhibit Number 7. BY MR. HUTCHINSON:

Q. Now, Mr. Jordan, I think you're reviewing that.

This affidavit bears the signature on the last page of Monica S. Lewinsky, is that correct?

A. Yes.

Q. And have you ever seen this signed affidavit before?

A. I don't think so.

Q. Do you not recall that Ms. Lewinsky brought this in and showed it to you?

A. She may have.

Q. And I'd be glad to refresh you. I know that some of this—

A. Yeah, if it's in the testimony, Congressman.

Q. Page 192 of your previous grand jury testimony. Is it your recollection that she showed this to you in a meeting in your office after she had signed it?

A. I stand by that testimony.

Q. And so the date of that signature of Ms. Lewinsky, is that January 7?

A. January 7th, 1998.

Q. All right. Now, whenever she presented this signed affidavit to you, did you read it sufficiently to know that it stated that Ms. Lewinsky did not have a sexual relationship with the President?

A. I was aware that that was in the affidavit.

Q. And I believe you previously testified that you're a quick reader and you skimmed it and familiarized yourself with it?

A. Skimmed it.

Q. And prior to seeing the signed affidavit that she brought to you, the day after it was signed, was there a time that Ms. Lewinsky called you concerning the affidavit and said that she had some questions about the draft of the affidavit?

A. Yes. I do recollect her calling me and asking me about the affidavit, and I said to her that she should talk to the—talk to Frank Carter, her counsel, about the affidavit and not to me.

Q. And if I could go into, again, some areas that had not been previously asked to you, and since Ms. Lewinsky testified to the grand jury on August 6th.

Ms. Lewinsky has testified that she dropped a copy of the affidavit to you, and that you—and that you and she had a telephone conversation in which you discussed changes to the affidavit. Does this refresh your recollection, and do you agree with Ms. Lewinsky's recollection of a discussion on changes in the affidavit?

A. I do agree with the assumption—I mean, I do agree with the statement that Ms. Lewinsky dropped the affidavit off and called me up about the affidavit and was quite verbose about it, and I sort of listened and said to her, "You need to talk to Frank Carter."

She was not satisfied with that, and so she kept talking and I kept doodling and listening as she went on in sort of a, for lack of a better word, babble about this—about this thing, but it was not my job to advise her about an affidavit. I don't do affidavits.

Q. Now, if I may show you, which would be Exhibit—

MR. HUTCHINSON: First, let me go ahead and offer 7.

SENATOR THOMPSON: It's made a part of the record.

[Jordan Deposition Exhibit No. 7 received in evidence.]

MR. HUTCHINSON: It's part of the record. And then go to Exhibit 8, which was marked as Exhibit 39 as your previous grand jury testimony.

[Jordan Deposition Exhibit No. 8 marked for identification.]

[Witness perusing document.]

BY MR. HUTCHINSON:

Q. Now, Exhibit 8 is a summary of telephone calls on January 6th, which would be the day before the affidavit was signed by Ms. Lewinsky on the 7th.

Now, you can reflect on that for a moment, but in reviewing these calls, it appears that Mr. Carter was paging Ms. Lewinsky early on in the day, 11:32 a.m., and then at 3:26, you had a telephone call with Mr. Carter for 6 minutes and 42 seconds.

And then there was—call number 6 was to Ms. Lewinsky, which was obviously a 24-second short call, and then a subsequent call for almost 6 minutes at 3:49 p.m. to Ms. Lewinsky.

Was this last call for 5 minutes to Ms. Lewinsky the call that you just referenced in which the draft affidavit was discussed?

A. I think that is correct. The 24-second call, I think, was voice mail.

Q. Was—was—pardon?

A. Voice mail.

Q. Certainly.

And subsequent to your conversation with Ms. Lewinsky for 5 minutes and 54 seconds, did you have two calls to Mr. Carter, which would be No. 9 and 10?

[Witness perusing document.]

THE WITNESS: Yes.

BY MR. HUTCHINSON:

Q. Do you know why you would have been calling Mr. Carter on three occasions, the day before the affidavit was signed?

A. Yeah. I—my recollection is—is that I was exchanging or sharing with Mr. Carter what had gone on, what she had asked me to do, what I refused to do, reaffirming to him that he was the lawyer and I was not the lawyer. I mean, it would be so presumptuous of me to try to advise Frank Carter as to how to practice law.

Q. Would you have been relating to Mr. Carter your conversations with Ms. Lewinsky?

A. I may have.

Q. And if Ms. Lewinsky expressed to you any concerns about the affidavit, would you have relayed those to Mr. Carter?

A. Yes.

Q. And if Mr. Carter was a good attorney that was concerned about the economics of law practice, he would have likely billed Ms. Lewinsky for some of those telephone calls?

A. You have to talk to Mr. Carter about his billing.

Q. It wouldn't surprise you if his billing did reflect a—a charge for a telephone conversation with Mr. Jordan?

A. Keep in mind that Mr. Carter spent most of his time in being a legal services lawyer. I think his concentration is primarily on service, rather than billing.

Q. But, again, based upon the conversations you had with him, which sounds like conversations of substance in reference to the affidavit, that it would be consistent with the practice of law if he charged for those conversations?

A. That's a question you'd have to ask Mr. Carter.

Q. They were conversations of substance with Mr. Carter concerning the affidavit?

A. And they were likely conversations about more than Ms. Lewinsky.

Q. But the answer was yes, that they were conversations of substance in reference to the affidavit?

A. Or at least a portion of them.

Q. In other words, other things might have been discussed?

A. Yes.

Q. In your conversation with Ms. Lewinsky prior to the affidavit being signed, did you in fact talk to her about both the job and her concerns about parts of the affidavit?

A. I have never in any conversation with Ms. Lewinsky talked to her about the job, on one hand, or job being interrelated with the conversation about the affidavit. The affidavit was over here. The job was over here.

Q. But the—in the same conversations, both her interest in a job and her discussions about the affidavit were contained in the same conversation?

A. As I said to you before, Counselor, she was always interested in the job.

Q. Okay. And she was always interested in the job, and so, if she brought up the affidavit, very likely it was in the same conversation?

A. No doubt.

Q. And that would be consistent with your previous grand jury testimony when you expressed that you talked to her both about the job and her concerns about parts of the affidavit?

A. That is correct.

Q. Now, on January 7th, the affidavit was signed. Subsequent to this, did you notify anyone in the White House that the affidavit in the Jones case had been signed by Ms. Lewinsky?

A. Yeah. I'm certain I told Betty Currie, and I'm fairly certain that I told the President.

Q. And why did you tell Betty Currie?

A. I'm—I kept them informed about everybody else that was—everything else. There was no reason not to tell them about that she had signed the affidavit.

Q. And why did you tell the President?

A. The President was obviously interested in her job search. We had talked about the affidavit. He knew that she had a lawyer. It was in the due course of a conversation. I would say, "Mr. President, she signed the affidavit. She signed the affidavit."

Q. And what was his response when you informed him that she had signed the affidavit?

A. "Thank you very much."

Q. All right. And would you also have been giving him a report on the status of the job search at the same time?

A. He may have asked about that, and—part of her problem was that, you know, she was—there was a great deal of anxiety about the job. She wanted the job. She was unemployed, and she wanted to work.

Q. Now, I think you indicated that he was obviously concerned about—was it her representation and the affidavit?

A. I told him that I had found counsel for her, and I told him that she had signed the affidavit.

Q. Okay. You indicated that he was concerned, obviously, about something. What was he obviously concerned about in your conversations with him?

A. Throughout, he had been concerned about her getting employment in New York, period.

Q. And he was also concerned about the affidavit?

A. I don't know that that was concern. I did tell him that the affidavit was signed. He knew that she had counsel, and he knew that I had arranged the counsel.

Q. Do you know whether or not the President of the United States ever talked to her counsel, Mr. Carter?

A. I have—I have no knowledge of that.

Q. Did you ever relate to Mr. Carter that you were having discussions with the President concerning his representation of Ms. Lewinsky and whether she had signed the affidavit?

A. I don't know whether I told him that she had—he had—I don't know whether I told Mr. Carter that I told the President he had signed the affidavit. It is—it is not beyond reasonableness.

Q. Now let's go on. After the affidavit was signed, were you ultimately successful in obtaining Ms. Lewinsky a job?

A. Yes.

Q. And in fact, the day after Ms. Lewinsky signed the affidavit, you placed a personal call to Mr. Ron Perelman of Revlon, encouraging him to take a second look at Ms. Lewinsky?

A. That is correct, based on the fact that Ms. Lewinsky thought that her interview had not gone well, when in fact it had gone well.

Q. Okay. And in fact, Ms. Lewinsky had called you on a couple of occasions after the interview and finally got a hold of you and told you she thought the interview went poorly?

A. That's correct.

Q. And as a response to that information, you did not call Mr. Halperin back, who you had previously talked to about the issue, but you called Mr. Perelman?

A. That's right.

Q. Was there a reason that you called Mr. Perelman in contrast to Mr. Halperin?

A. Well, the same reason I would have called you about a committee if you were chairman of it, as opposed to calling to a member of the committee.

Q. All right. You wanted to go to the top?

A. When it's necessary.

Q. And I remember a phrase you used. I might not have it exactly right, but you don't get any richer or more powerful than Mr. Perelman?

A. Certainly not much richer.

Q. Okay. And—and so you had a conversation with Mr. Perelman, and did you tell him something like, make it happen if it can happen?

A. I said, "This young lady"—I mean, I think I said, "This young lady has been interviewed. She thinks it did not go well. Would you look into it?"

Q. And what was his response?

A. That he would look into it.

Q. Now I'd like to show you the next exhibit, and before I do that, I would go back and offer Number 7.

SENATOR THOMPSON: Seven is the last. This would be Number 8 that you—that you have been discussing. The compilation of the telephone call record?

MR. HUTCHINSON: Yes.

MR. KENDALL: I object. Same ground as before. It's not best evidence. We don't know who compiled these. These are not primary records.

SENATOR THOMPSON: Mr. Jordan has verified several of these items, but I do notice there are some items here that do not have to do with Mr. Jordan, that we could not expect him to be able to verify.

So I would ask counsel, if he needs to identify any more of these conversations and use this to reflect Mr. Jordan's memory, he's free to do so, but as an exhibit, I think the objection is probably well taken.

MR. HUTCHINSON: Let me just state, Senator, that this is a compilation of calls based upon the records that have been in the Senate record, and this has been—this compilation has been in there some time.

Now, I, quite frankly, understand the objection, and it might have meritorious if this was being introduced into evidence in the actual trial, and so I would suggest perhaps, since he's identified most of the calls already, that this could be referenced as a deposition exhibit because he's referred to it and that's helpful, without—obviously, there might in a more—it might not be entered into evidence as such.

SENATOR THOMPSON: Could I ask you if it's been in the record as a compilation?

MR. HUTCHINSON: Yes, it has.

SENATOR THOMPSON: In this form? I notice that it has a grand jury—

MR. HUTCHINSON: It's—Senator, it's Volume III of the Senate record, page 161, and so it's all in there, anyway.

SENATOR THOMPSON: I notice in the record here, counsel is informing me that it is in the record, but there are several redactions. Is that correct?

MR. HUTCHINSON: That is correct, and for that reason—in fact, a number of these summaries are not redacted in our form and they're redacted in the record, and we'd like to have the opportunity to redact it in the form of taking out the personal telephone numbers.

MR. KENDALL: Senator Thompson, if I may be heard, my objection is—to this is a summary. We don't know who did it. We don't know what it's based on.

The witness has testified, and his testimony is in the record, so far as his recollection is refreshed.

I have no objection to original phone records, but I do object to the summary.

SENATOR THOMPSON: Counsel, could I suggest that maybe you just make a reference specifically to where it is in the existing record? I think it would serve your same purpose and to keep you from having—

MR. HUTCHINSON: Sure.

SENATOR THOMPSON:—to go through and redact everything. Would that be satisfactory?

MR. HUTCHINSON: I think that would be satisfactory, and what I can do is that I can withdraw this exhibit and reference in the transcript of this deposition that the exhibit is found in Table 35 of Senate record, Volume III, at page 161.

SENATOR DODD: Let me just ask the House Manager, if I can as well. Are these from the Senate record? I'm told that some of these are not from the Senate record, and we're kind of confined to the Senate record, as I understand it.

MR. HUTCHINSON: Well, other than the redactions, this summary itself is in the Senate record.

SENATOR THOMPSON: Yes.

Counsel informs me, it's already in. It refers to evidentiary record Volume IV.

MS. BOGART: Is it IV or III?

SENATOR THOMPSON: It says IV here. Part 2 of—Part 2 of 3.

So, for the record, this would be pages 1884 and 1885 of the evidentiary record, Volume IV, Part 2 of 3, all right?

MR. HUTCHINSON: Thank you.

SENATOR THOMPSON: All right. So the record will be—the objection will be sustained, and reference has been made.

SENATOR DODD: And can we just—because I presume you may have more of these coming along, and it seems to me you might want to have staff or others begin to work so we don't go through this every time, particularly with the unredacted material that may be included in here, which is not part of the Senate record.

The unredacted information comes out of the House record, as I understand, and that is a distinction.

MR. HUNDLEY: I would just add that Mr. Jordan—the last 3 days of his grand jury testimony, they asked him about every phone call, and if you want to use those, you know, go to his grand jury testimony, you know, I think it would move things along.

There isn't a phone call. We produced like a telephone book of phone calls that Mr. Jordan made, and they called them all out, after they got through asking about who's that, who's that and who's the—you've got a pretty good record of calls that might have some relevance in this.

SENATOR THOMPSON: All right, sir. All right.

SENATOR DODD: Let me also just suggest on the earlier—Senator Thompson, in the earlier objection raised by Counsel Kendall, sustained the objection, but had made reference to the fact that since this material

had been brought into the record that those—if any documentation is included there, that we—we do use the Senate documents with the redacted information, rather than the House records for the purposes of this deposition.

SENATOR THOMPSON: All right, sir.

MR. HUTCHINSON: Thank you.

SENATOR THOMPSON: Proceed.

BY MR. HUTCHINSON:

Q. And I will handle it this way, Mr. Jordan, and let me say that I was sort of constructing my questioning, so as not to get bogged down in an extraordinary number of telephone calls, but let me go to the chart in front of you which is Grand Jury Exhibit 44, which is marked for our purposes as Exhibit 9 for identification purposes.

[Jordan Deposition Exhibit No. 9 marked for identification.]

[Witness perusing document.]

BY MR. HUTCHINSON:

Q. And I'm going to—I'd like for you to refer that—refer you to that for purposes of putting this particular day, January 8th, in context and asking you some questions about some of those telephone calls.

SENATOR THOMPSON: I'm sorry. What was the question? Are you making reference for identification purposes?

MR. HUTCHINSON: Yes. This is Exhibit 9, which is Grand Jury Exhibit 44.

SENATOR THOMPSON: All right, for identification purposes.

MR. HUTCHINSON: Yes.

SENATOR THOMPSON: All right.

BY MR. HUTCHINSON:

Q. Now, this is the day, January 8th, which is the day that Ms. Lewinsky felt like she had a poor job interview. Does this reflect calls from the Peter Strauss residence to your office?

A. I see a call number 3, 11:50 a.m., Peter Strauss residence. The number is here to my office.

Q. All right.

A. And it says length of call, one minute.

Q. All right. And, in fact, calls 3, 4 and 5 and 9 are calls from the Peter Strauss residence to your office?

A. That is correct.

Q. And Peter Strauss is the residence in which Ms. Lewinsky was staying while in New York?

A. I just know that Peter Strauss, my old friend, is Monica Lewinsky's stepfather.

MR. HUNDLEY: But he wasn't there.

THE WITNESS: You know, where she was and all of that, I don't know. I'm just—

BY MR. HUTCHINSON:

Q. You received calls from Ms. Lewinsky on this particular day?

A. From this number, according to this piece of paper.

Q. And does this time reference coincide with your recollection as to when you received calls from Ms. Lewinsky on this particular day?

A. Yes.

Q. And during these calls is when she related the difficulty of the job interview; is that correct?

A. I believe so—that it had not gone well.

Q. All right. And then, subsequently, you put in a call to Mr. Perelman at Revlon?

A. Yes.

Q. And that was to encourage him to take a second look. Is that call number 6 on this summary?

A. Call number 6; it lasted one minute and 42 seconds.

Q. And is that the call that you placed to Mr. Perelman?

A. I believe that is correct.

Q. And this was subsequent to the calls that you received from Ms. Lewinsky?

A. That is correct.

Q. And then you let Ms. Lewinsky know that you had called Mr. Perelman; and do

you recall what you would have told her at that time?

A. I think I told her that I had spoken with, uh—with, uh, Mr. Perelman, the chairman, and that I was hopeful that things would work out.

Q. All right. And, in fact, they did work out because the next day you were informed that a temporary job—or a preliminary job offer had been made to Ms. Lewinsky?

A. That's right.

Q. So she was able to secure the job based upon your call to Mr. Perelman?

A. Based upon my call, from the time that I called Halperin through to Mr. Perelman.

Q. All right.

A. I take credit for that.

Q. All right. Now, in fact, you've used terms like "the Jordan magic worked"?

A. It—it has from time to time.

Q. And it did on this occasion?

A. I believe so.

Q. And then, you also informed Ms. Betty Currie that the mission was accomplished?

A. Yes.

Q. And after securing the job for Ms. Lewinsky, you did inform Betty Currie of that fact?

A. And the President.

Q. All right. And was the purpose of letting Betty Currie know so that she could tell the President?

A. She saw the President much more often than I did.

Q. And—but you wanted to inform the President personally that you were successful in getting Ms. Lewinsky a job?

A. Yes.

Q. And you did that, uh—was it on the—what, the day after she secured the job or the day—the day that she secured the job?

A. I don't know the answer to that.

Q. Well, shortly thereafter is it fair to say that you informed the President personally?

A. I certainly told him.

Q. All right. Now, at this point, you had successfully obtained a job for Ms. Lewinsky at the request of the President, and you had been successful in obtaining an attorney for Ms. Lewinsky. Did you see your responsibilities in regard to Ms. Lewinsky as continuing or completed?

A. I don't know, uh, that I saw them as, uh, necessary completed. There is—as you know from your own experience in helping young people with work, there tends to be some sense of responsibility to follow through, that they get to work on time, that they work hard, and that they succeed. So I don't think that I felt that my responsibility had terminated. I felt like I had a continuing responsibility to just make sure that it happened and that she—that it worked out all right. But I don't think I acted on that responsibility.

Q. Well, this is—the job was completed—I believe it was January 8th when she secured the job?

A. That was the day that I called Ronald Perelman.

Q. Okay, so it would have been the 9th that she would have been informed that she had the job.

A. That's right.

Q. So this is the 9th of January, and that mission had been accomplished. Now, I want you to recall your testimony of May 28th before the grand jury in which the question was asked to you—and this is at page 81; the question begins at the bottom of page 80.

Question: "When you introduced Monica Lewinsky to Frank Carter on December 22, 1997, what further involvement did you expect to have with Monica Lewinsky and Frank Carter?"

Answer: "Beyond getting her the job, I thought it was finished, done"—and what's that last word you used?

A. "Fini."

Q. "Fini." And so that was the basis on the question, was your previous testimony that after you got Ms. Lewinsky a job and after you secured her attorney, there was really no other need for involvement or continued meetings with her?

A. That is correct. That does not mean, on the other hand, that, uh, if you go to a meeting at the board, that you don't stop in and see how—how people are doing. In this circumstance, that process was short-circuited very quickly.

Q. I'm sorry?

A. She never ended up working there. You—you—you do remember that.

Q. Now, but you had described your frequent telephone calls from Ms. Lewinsky as being bordering on annoyance, I think. Is that a fair characterization?

A. That's a fair characterization.

Q. And you're a busy man. You stopped billing at \$450 an hour. You're having calls from Ms. Lewinsky. Were you glad at this point to have this "bordering on annoyance" situation completed?

A. "Glad" is probably the wrong word. "Relieved" is maybe a better word.

Q. All right. Now, during the time that you were helping Ms. Lewinsky secure a job, this was widely known at the White House, is that correct?

A. I—I don't know the extent to which it was widely known. I dealt with Ms. Currie and with the President.

Q. In fact, Ms. Cheryl Mills, sitting here at counsel table, knew that you were helping Ms. Lewinsky?

A. I believe that's true.

Q. And Betty Currie knew that you were helping Ms. Lewinsky?

A. Yes.

Q. The President knew it?

A. Yes.

Q. And you presumed that Bruce Lindsey knew it?

A. I presumed that. That's a very small number, given the number of people who work at the White House.

Q. Now, after that December 19 meeting—and I'm backtracking a little bit—the meeting that you had with Ms. Lewinsky in which she covered with you the fact that she had been subpoenaed, after that, you had numerous conversations with Ms. Betty Currie; is that correct?

A. I'm not sure I had numerous conversations with Ms. Betty Currie, but I have always during this administration been in touch with Ms. Currie.

Q. And during those conversations with Ms. Betty Currie, did you let her know that Ms. Lewinsky had been subpoenaed?

A. I think I've testified to that.

Q. All right, and so would that have been fairly shortly after the meeting on December 19th with Ms. Lewinsky that you notified Betty Currie that Ms. Lewinsky had in fact been subpoenaed?

A. I—I think that's safe to say, Counselor.

MR. HUTCHINSON: Senator, I—this would be a good time for a break, if that would meet with your approval, for lunch.

SENATOR THOMPSON: All right, sir.

MR. HUTCHINSON: And I'm—it's hard to estimate, and you probably don't trust lawyers when they tell you how long it's going to take after lunch, but—

SENATOR THOMPSON: Try your best. Do you want to make an estimate, or you'd rather not?

MR. HUTCHINSON: Oh, I think it would be less than an hour that I would have remaining, and most likely much shorter than that.

SENATOR THOMPSON: All right, sir.

THE WITNESS: May I make a suggestion? It's 25 minutes to 1. Do you want to go to 1 o'clock?

MR. HUTCHINSON: I think a break would be helpful.

THE WITNESS: To you or to me?

[Laughter.]

SENATOR THOMPSON: I think some of us have some scheduling issues, and I do understand that, so I'm open to any suggestions, Senator Dodd or anyone else, as to how long we want to take. Yesterday, they took an hour. I'm not—we have a conference and I could use a little extra time, I suppose, in addition to the hour, but it's not of major concern to me.

I assume you want to get back as soon as possible.

THE WITNESS: I'm prepared to forgo lunch and stay here as long as need be so we can finish. And we don't have to have lunch; we can just keep going, if it's all right with counsel.

SENATOR THOMPSON: Well, we've got some scheduling issues that we are going to have to take care of. So let's just make it—let's just make it—

SENATOR DODD: That clock is a little fast, I think.

SENATOR THOMPSON: Is it?

SENATOR DODD: Is that right? It's about 12:30?

THE VIDEOGRAPHER: It's 12:35.

SENATOR DODD: So an hour and 15 minutes. Is that—

SENATOR THOMPSON: What about—what about—let's come back at 1:45. That will be about, what—that's an hour and 10 minutes, isn't it, or 8 minutes, something like that?

All right. Without objection, then—

SERGEANT-AT-ARMS: Senator, we have lunch outside here. It's sandwiches—

SENATOR DODD: Can we go off the record?

SENATOR THOMPSON: Are we off the record? Let's go off the record.

THE VIDEOGRAPHER: We're going off the record now at 12:33 p.m.

[Whereupon, at 12:33 p.m., a luncheon recess was taken.]

AFTERNOON SESSION

THE VIDEOGRAPHER: We are going back on the record at 1:49 hours.

SENATOR THOMPSON: All right. Mr. Hutchinson?

MR. HUTCHINSON: Thank you, Senators.

DIRECT EXAMINATION BY HOUSE MANAGERS—  
RESUMED

BY MR. HUTCHINSON:

Q. Mr. Jordan, good afternoon.

A. Good afternoon.

Q. You testified very clearly earlier today that you were a close friend of the President. Would you also describe yourself as a friend of Mr. Kendall, sitting to my left, one of the attorneys for the President?

A. Not only is Mr. Kendall my friend, Mr. Kendall has, unfortunately, the distinction of graduating from Wabash College, a little, small town in Indiana, and I'm a graduate of DePauw University, and we have a 100-year rivalry. And Mr. Kendall and I bet.

Mr. Hutchinson, I am pleased to tell you that Mr. Kendall is in debt to me for 2 years because DePauw—

MR. KENDALL: May I object?

[Laughter.]

THE WITNESS: —because DePauw University has defeated Wabash College two times in succession. And so, yes, we are very good friends. I have great respect for him as a person, as a lawyer, and despite his undergraduate degree from Wabash, I respect his intellect.

BY MR. HUTCHINSON:

Q. May I assume from that answer that the answer to my question is yes?

A. The answer—the answer to your question is, indubitably, yes.

Q. Now I am going to ask another question in similar vein. You can answer yes or no. Do

you consider yourself a friend of Cheryl Mills?

A. That requires more than just a "yes" answer.

Q. I do not want to shortchange her, but I know that—in fact, I think you might have, to a certain extent, mentored her. Is that a fair description?

A. And vice versa.

Q. All right. And Bruce Lindsey, is he also a friend of yours?

A. Yes.

Q. Now—so when was the last time that you met with any member of the President's defense team?

A. I have not had a meeting with a member of the President's defense team. They were right nextdoor to me just a few minutes ago, and we said hello, but we have not had a meeting. And maybe if you'd tell me about what, I can be more specific.

Q. Well—and that's a good point. Certainly, we're lawyers, and we have casual conversations, and we visit and we exchange pleasantries, and that's the way life should be.

I guess I was more specifically going to the question as to whether you have discussed with the President's defense team any matter of substance relating to the present proceedings in the United States Senate.

A. Any matter of substance relating to these proceedings here in the United States Senate have been handled very ably by my lawyer, Mr. William Hundley.

Q. And I understand that, but my question is—despite your able representation by Mr. Hundley—my question is—is whether you had any meetings or discussions with the President's defense team in regard to these proceedings.

A. The answer is no.

Q. Thank you.

And has anyone briefed you other than your attorney, Mr. Hundley, on yesterday's deposition of Ms. Lewinsky?

A. The answer is no.

Q. Now, you know Greg Craig?

A. I do know Greg Craig.

Q. And he's a member of the President's defense team as well?

A. Yes.

Q. And you have not had any meetings of substance with him in regard to the present proceedings?

A. I have not.

Q. And have you had any meetings with any of the President's defense team in regard to not just the present proceedings, but prior proceedings related to your testimony before the grand jury or the investigation by the OIG?

A. I have had conversations with the President's lawyer, Mr. Bennett, and a conversation or two with Mr. Kendall on the issue of settlement of the Paula Jones case, and I believe I testified to that before the grand jury.

Q. All right. Thank you, Mr. Jordan, and now let me move to another area.

Do you recall an occasion in which Ms. Betty Currie came to see you in your office a few days before the President's deposition in the Jones case on January 17th?

A. Yes, I do.

Q. And I believe you have previously indicated that it was on a Thursday or Friday, which would have been around the 15th or 16th?

A. Yeah. I've testified to that specifically as to the date in my grand jury testimony, and I stand on that testimony.

Q. Certainly. But in general fashion, it would have been a couple of days before the President's testimony on January 17th?

A. I believe that is correct, sir.

Q. And did—was this meeting with Betty Currie originated by a telephone call with Ms. Betty Currie?

A. Ms. Currie called me.

Q. And did she explain to you why she needed to see you?

A. Yes, she did.

Q. And was that that she had a call from Michael Isikoff of Newsweek magazine?

A. That is correct.

Q. And what did she say about that that caused her to call you?

A. She had said that Mr. Isikoff had called her and wanted to interview her, having something to do with Monica Lewinsky, and I said to her, why don't you come to see me.

Q. And why did you ask her to come see you, rather than just talking to her about it over the telephone?

A. I felt more comfortable doing that, and I think she felt comfortable or more comfortable doing that, rather than doing it on the telephone. And so I asked her to come to my office, and she did.

Q. Did you consider—or did she seem upset at the time that she called?

A. I think she was concerned.

Q. And as—you did in fact meet with her in your office?

A. I did.

Q. And what did she relate to you in your office?

A. That Michael Isikoff was a friend of hers, and that Michael Isikoff had called to—pursuant to a story that he was about to write having to do with Ms. Lewinsky, and she—she was concerned about what to do. And I suggested to her that she talk to Bruce Lindsey and to Mike McCurry as to what she should do, Bruce Lindsey on the legal side and Mike McCurry on the communications side.

Q. Did she explain to you what it was specifically that Mr. Isikoff was inquiring about in reference to Ms. Lewinsky?

A. No. I don't remember the exact nature of Isikoff's inquiry. What I do remember is that Isikoff, a Newsweek magazine reporter, had called and was making these inquiries, and she was at a loss as to where to turn or to what to do, and I think that stemmed from the fact of some White House policy saying that before you talk to anybody in the media, you check it out.

Q. And did she explain to you that she had already seen Bruce Lindsey about it before she came to see you?

A. She did not.

Q. And so you were basically telling her to see Bruce Lindsey, and if she had already seen that, then that might have not been that helpful?

A. I don't know whether I was being helpful or not. I responded to her, and I gave her the advice to call Bruce Lindsey and to call Mike McCurry.

Q. Let me refer you to the testimony of Ms. Betty Currie, and perhaps that will help refresh you, and if not, perhaps you can respond to it.

A. Sure.

Q. And for reference purposes, I'm referring to the grand jury testimony of Ms. Betty Currie on May 6th, 1998, at page 122.

MR. HUTCHINSON: Is there a way I—

MR. HUNDLEY: We don't have that. If you want to—if you want us to read along or just—

THE WITNESS: Wait a minute. I might have it right here. What page?

MR. HUTCHINSON: What's the exhibit number?

MR. HUNDLEY: How long is it, Mr. Hutchinson?

MR. HUTCHINSON: This would just be some short question-and-answer.

MR. HUNDLEY: Why don't you just read it? We don't—go ahead.

THE WITNESS: Oh, fine.

BY MR. HUTCHINSON:

Q. I'm going to read it, and if there's—it's at page 122, but this just puts it in context.

The question: "Ms. Currie, if I'm not mistaken, if I could ask you a couple of questions. When you found out Mr. Isikoff was curious about the courier receipts, you were concerned enough to go visit Vernon Jordan?"

The answer is: "Correct."

And I'm skipping on down. I'm trying to point to a couple of things that are of interest.

And question: "And you went to Bruce Lindsey because you said you knew that he was working on the matter?"

And question: "What did Bruce tell you after you told him this?"

And answer: "He told me not to call him back, referring to Mr. Isikoff, make him work for the story. I remember that."

And then she refers to going to see Mr. Jordan.

Why did you tell him, or, "Why did you call Mr. Jordan?"

Answer: "Because I had a comfort level with Vernon, and I wanted to see what he had to say about it."

MR. KENDALL: Counsel, excuse me. I object to your reading of that, but my understanding that the conversation with Bruce Lindsey occurred later. Are you representing that it occurred before the visit to Mr. Jordan? I don't have the transcript in front of me.

MR. HUTCHINSON: Well, I'm—I'm not making a representation one way or the other. I'm just representing what Ms. Currie testified to, and that is the context of it, that the visit to Mr. Lindsey was prior to going to see Mr. Jordan. And that is at page 122 through 130 of Betty Currie's transcript of May 6th, 1998.

BY MR. HUTCHINSON:

Q. But the first question, Mr. Jordan, is that she refers to courier receipts. I believe that was referring to courier records of gifts from Ms. Lewinsky to the President.

Did Ms. Currie come to you and say specifically that Mr. Isikoff was inquiring about courier records on gifts from Ms. Lewinsky to the President?

A. I have no recollection of her telling me about the specific inquiry that Isikoff was making. The issue for her was whether or not she should see him, and I said to her, before she made any decision about that, that she should talk to these two particular people on the White House staff.

Q. Well, again, if Ms. Currie refers to the courier receipts on gifts, would that be in conflict in any way with your recollection as to what Mr. Isikoff was inquiring about, what Ms. Currie told you?

A. I stand on what I've just said to you.

Q. Now, you followed this case, and, of course—

SENATOR THOMPSON: While we're on that subject, does counsel need any additional time to look over that? I don't want to leave an objection on the record. If you feel like you need to press it—

SENATOR DODD: Do you have a copy of the document?

MR. KENDALL: Senator Thompson, we don't have the full copy of the Currie transcript. This was not—

SENATOR THOMPSON: Why don't we reserve this, then, and you can be looking at it, and then we'll—we'll take it up a little later.

MR. KENDALL: We're still actually missing some pages of the transcript. I don't know if somebody has that.

SENATOR DODD: Why don't you see if you can't get them for them?

SENATOR THOMPSON: Okay.

SENATOR DODD: All right?

SENATOR THOMPSON: We'll let them be doing that, if that's okay with everyone and—

SENATOR DODD: And you'll withdraw your objection as of right now, or—

MR. KENDALL: Yes. I'll withdraw it until I can scrutinize the pages, but I may then renew it.

SENATOR THOMPSON: All right, sir.

BY MR. HUTCHINSON:

Q. On—there's been some testimony in this case by Ms. Lewinsky that on December 28th, there was a gift exchange with the President; that subsequent to that, Ms. Currie went out and picked up gifts from Ms. Lewinsky, and she put those gifts under Ms. Currie's bed. Are you familiar with that basic scenario?

A. I read about it and heard about it. I do not know that because that was told to me by Ms. Lewinsky or by Ms. Currie.

Q. Certainly, and I'm just setting that forth as a backdrop for my questioning.

Now, you know, I guess it's—it might be difficult to understand a great deal of concern about a news media call, but if that news media call was about gifts or evidence that was in fact under Ms. Currie's bed or involved in that exchange, then that would be a little heightened concern.

A. Yes.

Q. Would that seem fair?

A. I do not, as I've said to you, know specifically the nature of Mr. Isikoff's inquiry to Ms. Currie, and I know nothing at that particular time about Mr. Isikoff making an inquiry about gifts under the bed.

Q. All right. I refer you to your grand jury testimony of March 5, 1998, at page 73, when the question was asked of you about Ms. Currie's visit to you, "What exactly did she tell you?" and your answer: "She told me that she had a call from Isikoff from Newsweek magazine, who was calling to make inquiries about Monica Lewinsky and some taped conversations, and I said you have to talk to Mike McCurry and you have to talk to Bruce Lindsey."

And so, despite your statement today that you have no recollection as to what she told you, going back to your March testimony, you referred to her relating Isikoff inquiring about taped conversations.

A. And that's what it says, "taped conversations," and I stand by that.

What was taped, I don't know.

Q. Well, I don't think you previously today mentioned taped conversations.

MR. HUNDLEY: Well, I don't really think your question would have called for that response, but I'm not going to object.

MR. HUTCHINSON: Thank you, Mr. Hundley.

BY MR. HUTCHINSON:

Q. I'm trying to get to the heart of the matter. Ms. Currie is concerned enough that she leaves the White House and goes to see Mr. Vernon Jordan, and she raises an issue with you and, according to your testimony, you told her simply, you need to go see Mike McCurry or Bruce Lindsey.

A. That is correct.

Q. And it's your testimony that she never raised with you any issue concerning the—Mr. Isikoff inquiring about gifts and records of gifts by Ms. Lewinsky?

A. I stand by what I—what you just read to me about—from my testimony about tapes conversations. I have no recollection about gifts or gifts under the bed.

Q. Okay. Are you saying it did not happen, or you have no recollection?

A. I certainly have no recollection of it.

Q. Well, do you have a specific recollection that it did not happen, that she never raised the issue of gifts with you?

A. It is my judgment that it did not happen.

Q. Did she seem satisfied with your advice to go see Mr. Bruce Lindsey, who she presumably had already seen?

A. I assumed that she took my advice.

Q. Did she discuss in any way with you the incident on December 28th when she retrieved the gifts—

A. She did not.

Q. —from Ms. Lewinsky?

A. She did not.

Q. Now, a few days later, the President of the United States testified before the grand jury in the—excuse me—testified in his deposition in the Jones case.

After the President's deposition, did he have a conversation with you on that day?

A. Yes. I'm sure we talked.

Q. And then, on the next day, and without getting into the entire record of telephone calls, there was, is it fair to say, a flurry of telephone calls in which everyone was trying to locate Ms. Monica Lewinsky?

A. The next day being which day?

Q. The next day would have been—well, January 18th.

A. That's Sunday.

Q. Correct.

MR. HUNDLEY: I think it's the 19th.

THE WITNESS: I think it's the 19th when there was a flurry of calls.

MR. HUTCHINSON: I think you're absolutely correct.

THE WITNESS: We'll be glad to be helpful to you in any way we can.

MR. HUNDLEY: We're even now. I was wrong on one. You were wrong.

MR. HUTCHINSON: That's fair enough, fair enough.

BY MR. HUTCHINSON:

Q. And on the 19th—of course, the 18th is in the record where the President visited with Ms. Betty Currie at the White House—on the 19th, which would have been Monday, was there on that day a flurry of activity in which there were numerous telephone calls, trying to locate Monica Lewinsky?

A. Yes. And you have a record of those telephone calls, and those telephone calls, Congressman, were driven by two events—first, the Drudge Report; and later in the afternoon, driven by the fact that, uh, I had been informed by Frank Carter, counsel to Ms. Lewinsky, that he had been relieved of his responsibilities as her counsel. And that is the basis for these numerous telephone calls.

Q. And you yourself were engaged in some of those telephone calls trying to locate Ms. Lewinsky?

A. Oh, yes, to ask her—I mean, I had just found out that she had been involved in these conversations with this person called Linda Tripp, and that was of some curiosity and concern to me.

Q. And you had heard Ms. Tripp's name previously on December 31st at the Park Hyatt?

A. I've testified already that I never heard the name "Linda Tripp" until I saw the Drudge Report. I did not testify that I heard the name "Linda Tripp" on December 31st.

Q. So the first time you heard Ms. Tripp's name was on January 19th when the Drudge Report came out?

A. That is correct.

Q. And you had already secured a—

A. The 18th, I believe it was.

MR. HUNDLEY: Eighteenth.

THE WITNESS: Not the 19th.

BY MR. HUTCHINSON:

Q. Thank you.

You had already secured a job for Ms. Lewinsky?

A. That is correct.

Q. And you—

A. Found a lawyer.

Q. And a lawyer. And, as you had said at one point, job finished—fini. Why is it that you felt like you needed to join in the search for Ms. Lewinsky?

A. If you had been sitting where I was, and all of a sudden you found out, after getting

other doors for employment as a black lawyer graduating from Howard University were open to me, that's always—that's always been etched in my heart and my mind, and as a result, because I stand on Mr. Days' shoulders and Don Hollowell's shoulders, I felt some responsibility to the extent that I could be helpful or got in a position to be helpful, that I would do that.

And there is I think ample evidence, both in the media and by individuals across this country, that at such times that I have been presented with that opportunity that I have taken advantage of that opportunity, and I think that I have been successful at it.

Q. Was your assistance to Ms. Lewinsky which you have described in any way dependent upon her doing anything whatsoever in the Paula Jones case?

A. No.

IN THE SENATE OF THE UNITED STATES SITTING FOR THE TRIAL OF THE IMPEACHMENT OF WILLIAM JEFFERSON CLINTON, PRESIDENT OF THE UNITED STATES

EXCERPTS OF VIDEO DEPOSITION OF SIDNEY BLUMENTHAL

(Wednesday, February 3, 1999, Washington, D.C.)

SENATOR SPECTER: If none, I will swear the witness.

Mr. Blumenthal, will you please stand up and raise your right hand?

You, Sidney Blumenthal, do swear that the evidence you shall give in this case now pending between the United States and William Jefferson Clinton, President of the United States, shall be the truth, the whole truth, and nothing but the truth, so help you, God?

MR. BLUMENTHAL: I do.

Whereupon, SIDNEY BLUMENTHAL was called as a witness and, after having been first duly sworn by Senator Specter, was examined and testified as follows:

SENATOR SPECTER: Thank you.

THE WITNESS: Thank you.

SENATOR SPECTER: The House Managers may begin their questioning.

MR. ROGAN: Thank you, Senator.

EXAMINATION BY HOUSE MANAGERS

BY MR. ROGAN:

Q. Mr. Blumenthal, first, good morning.

A. Good morning to you.

Q. My name is Jim Rogan. As you know, I am one of the House Managers and will be conducting this deposition pursuant to authority from the United States Senate.

First, as a preliminary matter, we have never had the pleasure of meeting or speaking until this morning, correct?

A. That's correct.

Q. If any question I ask is unclear or is in any way ambiguous, if you would please call that to my attention, I will be happy to try to restate it or rephrase the question.

A. Thank you.

Q. Mr. Blumenthal, where are you currently employed?

A. At the White House.

Q. Is that in the Executive Office of the President?

A. It is.

Q. What is your current title?

A. My title is Assistant to the President.

Q. Was that your title on January 21st, 1998?

A. It was.

Q. For the record, that is the date that The Washington Post story appeared that essentially broke the Monica Lewinsky story?

A. Yes.

Q. On that date, were you the Assistant to the President as to any specific subject matter?

A. I dealt with a variety of areas.

Q. Did your duties entail any specific matter, or were you essentially a jack-of-all-trades at the White House for the President?

A. Well, I was hired to help the President develop his ideas and themes about the new consensus for the country, and I was hired to deal with problems like the impact of globalization, democracy internationally and domestically, the future of civil society, and the Anglo-American Project; and I also was hired to work on major speeches.

Q. You testified previously that your duties are such as the President and Chief of Staff shall decide. Would that be a fair characterization?

A. Oh, yes.

Q. How long have you been employed in this capacity?

A. Since August 11th, 1997.

Q. And in the course of your duties, do you personally advise the President as to the matters that you just shared with us?

A. Yes.

Q. How often do you meet with the President personally to advise him?

A. It varies. Sometimes several times a week; sometimes I go without seeing him for a number of weeks at a time.

Q. Is dealing with the media part of your—your job?

A. Yes. It's part of my job and part of the job of most people in the White House.

Q. Was that also one of your responsibilities on January 21st, 1998, when the Monica Lewinsky story broke?

A. Yes.

Q. You previously testified that you had a role in the Monica Lewinsky matter after the story broke in The Washington Post on that date, at least in reference to your White House duties; is that correct?

A. I'm unclear on what you mean by "a role."

Q. Specifically, you testified that you attended meetings in the White House in the Office of Legal Counsel in the morning and in the evening almost every day once the story broke?

A. Yes.

Q. And what times did those meetings occur after the story broke, these regular meetings?

A. The morning meetings occurred around 8:30, after the morning message meeting, and the evening meetings occurred around 6:45.

Q. Are those meetings still ongoing?

A. No.

Q. Can you tell me when those meetings ended?

A. Oh, I'd say about the time that the impeachment trial started.

Q. That would be about a month or—about a month ago?

A. Yeah, something like that.

Q. Thank you.

A. I don't recall exactly.

Q. Sure. But up until that point, were these essentially regularly scheduled meetings, twice a day, 8:30 in the morning and 6:45 in the evening?

A. Right.

Q. Did you generally attend those meetings?

A. Generally.

Q. Now, initially, when you testified before the grand jury on February 26th, 1998, your first grand jury appearance, you stated that these twice-daily meetings dealt exclusively with the Monica Lewinsky matter, correct?

A. They dealt with our press reaction, how we would respond to press reports dealing with it. This was a huge story, and we were being inundated with hundreds of calls.

Q. Right.

A. So—

Q. What I'm—what I'm trying to decipher is that at least initially, at the time of your first grand jury appearance, which was about a month after the story broke—

A. Right.

Q.—the meetings were exclusively related to Monica Lewinsky. Is that correct?

A. Pretty much.

Q. And then, 4 months later, when you testified before the grand jury in June, you said these meetings were still ongoing, and you referenced them at that time as discussing the policy, political, legal and media impact of scandals and how to deal with them. Do you remember that testimony?

A. If I could see it.

Q. Certainly. I'm happy to invite your attention to your grand jury testimony of June 4th, 1998, page 25, lines 1 through 5.

MR. ROGAN: And that would be, for the Senators' and counsel's benefit—I believe that's in Tab 4 of the materials provided.

[Witness perusing document.]

THE WITNESS: Right. I see it.

BY MR. ROGAN:

Q. You've had a chance to review that, Mr. Blumenthal?

A. I have.

Q. And that—that's correct testimony?

A. Yes.

Q. Thank you.

At the time you spoke of—you used the word "scandals" in the plural, and you were asked on June 4th what other scandals were discussed and you said they range from the Paula Jones trial to our China policy. Is that a fair statement?

A. Oh, yes, yes. I do.

Q. Who typically attended those meetings?

A. As I recall, there were about a dozen or so people, sometimes more, sometimes less.

Q. Do you remember the names of the people?

A. I'll try to.

Q. Would it be helpful if I directed your attention to a couple of passages in the grand jury testimony?

A. Sure, if you'd like.

MR. ROGAN: Inviting the Senate and counsel's attention to the February 26th grand jury testimony, page 11, lines 2 through 16.

[Witness perusing document.]

THE WITNESS: Sure. Yeah.

BY MR. ROGAN:

Q. That would be Tab Number 1.

A. Right, I see that.

What it says here is that the names listed are Charles Ruff, Lanny Breuer, who is right over here, Cheryl Mills, Bruce Lindsey, John Podesta, Rahm Emanuel, Paul Begala, Jim Kennedy, Mike McCurry, Joe Lockhart, Ann Lewis, Adam Goldberg, Don Goldberg, and that's—those are the names that I—that I recall.

Q. Thank you.

And just for my benefit, Mr. Ruff, Mr. Breuer, Ms. Mills, and Mr. Lindsey, those are all White House counsel?

A. Yes.

Q. Could you just briefly identify for the record the other individuals that are—that are listed in your testimony?

A. Sure. John Podesta was Deputy Chief of Staff. Rahm Emanuel was a Senior Advisor. Paul Begala had the title of Counselor. Jim Kennedy was in the Legal Counsel Office. Mike McCurry was Press Secretary. Joe Lockhart at that time was Deputy Press Secretary. Ann Lewis was Director of Communications, still is. Adam Goldberg worked as a—as an Assistant in the Legal Counsel Office, and Don Goldberg worked in Legislative Affairs.

Q. Thank you.

Mr. Blumenthal, specifically inviting your attention to January 21st, 1998, you testified before the grand jury that on that date, you personally spoke to the President regarding the Monica Lewinsky matter, correct?

A. Yes.

Q. When you spoke to the President, did you discuss The Washington Post story about Ms. Lewinsky that appeared that morning?

her a job and after getting her a lawyer, that there's a report that says that she's been—she's been taped by some person named Linda Tripp, I think just, mother wit, common sense, judgment, would have suggested that you would be interested in what that was about.

Q. And were you trying to provide assistance to the President of the United States in trying to locate Ms. Lewinsky?

A. I was not trying to help the President of the United States. At that point, I was trying to satisfy myself as to what had gone on with this person for whom I had gotten both a job and a lawyer.

Q. Now, subsequent to this, you felt it necessary to make a public statement on January 22 in front of the Park Hyatt Hotel?

A. I did make a public statement on January 22nd at the Park Hyatt Hotel.

Q. And what was the reason that you gave this public statement?

A. I gave the public statement because I was being rebuked and scorned and talked about, sure as you're born, and I felt some need to explain to the public what had happened.

MR. HUTCHINSON: All right. And I have a copy of that public statement that is marked as Grand Jury Exhibit 87, but we will mark it as Exhibit—

SENATOR THOMPSON: Seven, I believe.  
SENATOR DODD: We've gone through 9, haven't we? You're marking it. If you're only marking it, I think we—

SENATOR THOMPSON: We have six exhibits, didn't we?

SENATOR DODD: We've done more than that, haven't we?

MR. HUTCHINSON: I have nine.  
SENATOR DODD: Nine. Did you enter 9, or did you just note it?

SENATOR THOMPSON: Six were entered, two were sustained, I think.

MS. MILLS: I have seven.  
SENATOR DODD: Nine, you have here, but we didn't—I don't know if you—you don't have 9 as an exhibit, or just noted?

MR. GRIFFITH: Nine was Grand Jury 44.

MR. HUTCHINSON: We just noted it, I believe.

SENATOR DODD: You didn't ask that it be entered in the record?

MR. HUTCHINSON: I believe that's correct.

SENATOR DODD: Yes.

SENATOR THOMPSON: How about those we sustained objections to? That doesn't count.

SENATOR DODD: Well, they're still marked.

SENATOR THOMPSON: They were marked?

SENATOR DODD: So which one should this be? Ten?

SENATOR THOMPSON: This will be 10?  
SENATOR DODD: This is 10, then.

MR. HUTCHINSON: All right, Number 10.  
[Jordan Deposition Exhibit No. 10 marked for identification.]

BY MR. HUTCHINSON:

Q. Do you have a copy of that, Mr. Jordan?

A. I have a copy of it. Thank you.

Q. Thank you. Now, prior to making this public statement, did you consult with the President's attorney, Mr. Bob Bennett?

A. I did not, not about this statement.

Q. Did you consult with the President's attorney, Mr. Bob Bennett?

A. I did not consult with him. Mr. Bennett came to my office and met with me and my attorney, Mr. Hundley, in my office.

Q. All right. And that was sometime prior to making this statement?

A. That is correct.

Q. And it would be—and it would have been between the 19th and the 22nd?

A. That is correct.

Q. It would have been after all of the public issues—

A. It was after—  
Q.—came up?

A.—I returned from Washington, and it may have been—from New York—and it may have been, I think, Wednesday afternoon.

Q. Now, in this statement, you indicated that you referred Ms. Lewinsky for interviews at American Express and at Revlon.

A. That is correct, and Young & Rubicam.

Q. And in fact, as your testimony today indicates, you did more than refer her for interviews, did you not?

A. Explain what you mean, and I'll be happy to answer.

Q. Well, in fact, when the interview went poorly, according to Ms. Lewinsky, you made calls to get her a second interview and to make it happen.

A. That is safe to say.

Q. All right. And I think you've also described your involvement in the job search as running the job search?

A. Yes.

Q. And so it was a little bit more than simply referring her for interviews. Is that a fair statement?

A. That's a fair statement.

Q. And then, in this statement, you also indicate that "Ms. Lewinsky was referred to me by Ms. Betty Currie"—

A. Yes.  
Q.—is that correct?

A. That is correct.

Q. And in fact, you were acting, as you stated, at the behest of the President?

A. Through Ms. Currie. I'm satisfied with this statement as correct.

Q. So—but you were acting in the job search at the behest of the President, as you have previously testified?

A. I've testified to that.

MR. HUTCHINSON: Now, we would offer this as Exhibit No. 10.

SENATOR THOMPSON: Without objection, it will be made a part of the record.

[Jordan Deposition Exhibit No. 10 received in evidence.]

MR. HUNDLEY: The only problem with this line of questioning is I think I wrote that thing.

[Laughter.]  
BY MR. HUTCHINSON:

Q. After you—after you last testified before the grand jury in June of '98, since then, the President testified before the grand jury in August, and prior to his testimony before the grand jury in August, he made his statement to the Nation in which he—I believe the language was admitted to "an inappropriate relationship with Ms. Lewinsky."

Now, at the time that you testified in June of '98, you did not have this information, did you?

A. He had not made that statement on the 17th of August, that's for sure.

Q. And was he in fact, to your knowledge, still denying the existence of that relationship?

A. I think, as I remember the statement, he said he misled the American people.

Q. And subsequent to this admission, did you talk to your friend, the President of the United States, about his false statements to you?

A. I have not spoken to him about any false statements, one way or the other.

Q. Now, you have testified that you in the job search were acting at the behest of the President of the United States; is that correct?

A. I stand on that.

Q. And there is no question but that Ms. Monica Lewinsky understood that?

A. I have to assume that she understood that.

Q. Okay. And in the law, there is the rule of agency and apparent authority. Is it safe

to assume that Ms. Lewinsky believed that you had apparent authority on behalf of the President of the United States?

A. I think I know enough about the law to say that the law of agency is not applicable in this situation where there was a potential romance and not a work situation. I think the law of agency has to do with a work situation and an employment situation and not having to do with some sort of romance. I think that's right.

Q. Well, let me take it out of the legal realm.

A. You raised it—I didn't.

Q. And let's put it in the realm of mother wit. Ms. Lewinsky is looking to you as a friend of the President of the United States, knowing that you're acting at the behest of the President of the United States. Is it not reasonable to assume that when she communicates something to you or she hears something from you, that it's as if she is talking to someone who is acting for the President?

A. No. When she's talking to me, she's talking to me, and I can only speak for me and act for me.

MR. HUTCHINSON: Could I have just a moment?

SENATOR THOMPSON: Yes.

MR. HUTCHINSON: At this time, Your Honors, the House Managers would reserve the balance of its time.

SENATOR THOMPSON: Counsel?

MR. HUNDLEY: Fine.  
SENATOR THOMPSON: All right.

MR. HUTCHINSON: Thank you, Mr. Jordan.

THE WITNESS: Thank you, Mr. Hutchinson.

SENATOR THOMPSON: Mr. Kendall?

EXAMINATION BY COUNSEL FOR THE PRESIDENT  
BY MR. KENDALL

Q. Mr. Jordan, is there anything you think it appropriate to add to the record?

A. Mr. Hutchinson, I'd just like to—

MR. HUTCHINSON: I'm going to object to the form of that question. I think that even though—and that's not even a leading question; that's an open-ended question that calls for a narrative response. And I think in fairness to the record that that is just simply too broad for this deposition purpose.

SENATOR THOMPSON: Mr. Kendall, is there any chance of perhaps your rephrasing the question somewhat?

MR. KENDALL: Certainly.

BY MR. KENDALL:

Q. Mr. Jordan, you were asked questions about job assistance. Would you describe the job assistance you have over your career given to people who have come to you requesting help finding a job or finding employment?

A. Well, I've known about job assistance and have for a very long time. I learned about it dramatically when I finished at Howard University Law School, 1980, to return home to Atlanta, Georgia to look for work. In the process of my—during my senior year, it was very clear to me that no law firm in Atlanta would hire me. It was very clear to me that, uh, I could not get a job as a black lawyer in the city government, the county government, the State government or the Federal Government.

And thanks to my high school bandmaster, Mr. Kenneth Days, who called his fraternity brother, Donald L. Hollowell, a civil rights lawyer, and said, "That Jordan boy is a fine boy, and you ought to consider him for a job at your law firm," that's when I learned about job referral, and that job referral by Kenneth Days, now going to Don Hollowell, got me a job as a civil rights lawyer working for Don Hollowell for \$35 a week.

I have never forgotten Kenneth Days' generosity. And given the fact that all of the