EXHIBITS OF
MANAGER JAMES ROGAN

BEFORE THE UNITED STATES SENATE

FEBRUARY 6, 1999

DEPOSITION PRESENTATION

"Fourth, article II alleges that the President obstructed justice by denying to his closest aides he had a sexual relationship with Monica Lewinsky, the very same denial he made to his family and his friends and to the American people.

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Having made the announcement to the whole country, it is simply absurd, I suggest to you, to believe that he was somehow attempting corruptly to influence his senior staff when he told them virtually the same thing at the same time."

Charles Ruff
Congressional Record
January 19, 1999, S493

EXHIBIT
ROGAN-40

Q. Now, you took the same oath to tell the truth, the whole truth, and nothing but the truth on January 17th, 1998 in a deposition in the Paula Jones litigation; is that correct, sir?

A. I did take an oath then.

Q. Did the oath you took on that occasion mean the same to you then as it does today?

A. I believed then that I had to answer the questions truthfully, that is correct.

Clinton Grand Jury Testimony, P.6-7

EXHIBIT
ROGAN-44

In his civil deposition, The President perjured himself about:

- the nature and details of his relationship with Ms. Lewinsky;
- being asked if anyone had reported to him within the two weeks before the deposition that they had had a conversation with Ms. Lewinsky concerning the *Jones v. Clinton* case;
- being alone with a Ms. Lewinsky;
- the gifts that he and Ms. Lewinsky exchanged;
- his knowledge of whether and when he spoke with Ms. Lewinsky about the possibility of her testifying in *Jones v. Clinton*, and lying about his knowledge of her being subpoenaed to testify; and
- his knowledge of Ms. Lewinsky's false affidavit.

EXHIBIT
ROGAN-41

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

EXHIBIT
ROGAN-42

- the last time he had seen Ms. Lewinsky was when she had come to the White House to see Betty Currie;
- that Betty Currie was present when the President had made a joking reference about the Jones case to Ms. Lewinsky;
- that Betty Currie was his source of information about Vernon Jordan's assistance to Ms. Lewinsky;
- and that Betty Currie had helped set up the meetings between Ms. Lewinsky and Mr. Jordan regarding her move to New York.

EXHIBIT
ROGAN-43