

Ms. Lewinsky told the President of her dismissal. He promised to bring her back after the election, and they had a sexual encounter.

#### A. Earlier Observations of Ms. Lewinsky in the West Wing

Ms. Lewinsky's visits to the Oval Office area had not gone unnoticed. Officer Fox testified that "it was pretty commonly known that she did frequent the West Wing on the weekends." (276) Another Secret Service uniformed officer, William Ludtke III, once saw her exit from the pantry near the Oval Office; she seemed startled and possibly embarrassed to be spotted. (277) Officer John Muskett testified that "if the President was known to be coming into the Diplomatic Reception Room, a lot of times [Ms. Lewinsky] just happened to be walking down the corridor, you know, maybe just to see the President." (278) Ms. Lewinsky acknowledged that she tried to position herself to see the President. (279) Although they could not date them precisely, Secret Service officers and agents testified about several occasions when Ms. Lewinsky and the President were alone in the Oval Office. William C. Bordley, a former member of the Presidential Protective Detail, testified that in late 1995 or early 1996, he stopped Ms. Lewinsky outside the Oval Office because she did not have her pass. (280) The President opened the Oval Office door, indicated to Agent Bordley that Ms. Lewinsky's presence was all right, and ushered Ms. Lewinsky into the Oval Office. (281) Agent Bordley saw Ms. Lewinsky leave about half an hour later. (282) Another former member of the Presidential Protective Detail, Robert C. Ferguson, testified that one Saturday in winter, the President told him that he was expecting "some staffers." (283) A short time later, Ms. Lewinsky arrived and said that "[t]he President needs me." (284) Agent Ferguson announced Ms. Lewinsky and admitted her to the Oval Office. (285) About 10 or 15 minutes later, Agent Ferguson rotated to a post on the Colonnade outside the Oval Office. (286) He glanced through the window into the Oval Office and saw the President and Ms. Lewinsky go through the door leading toward the private study. (287) Deeming her frequent visits to the Oval Office area a "nuisance," one Secret Service Officer complained to Evelyn Lieberman, the Deputy Chief of Staff for Operations. (288) Ms. Lieberman was already aware of Ms. Lewinsky. In December 1995, according to Ms. Lewinsky, Ms. Lieberman chided her for being in the West Wing and told her that interns are not permitted around the Oval Office. Ms. Lewinsky (who had begun her Office of Legislative Affairs job) told Ms. Lieberman that she was not an intern anymore. After expressing surprise that Ms. Lewinsky had been hired, Ms. Lieberman said she must have Ms. Lewinsky confused with someone else. (289) Ms. Lieberman confirmed that she reprimanded Ms. Lewinsky, whom she considered "what we used to call a 'clutch' . . . always someplace she shouldn't be." (290)

In Ms. Lewinsky's view, some White House staff members seemed to think that she was to blame for the President's evident interest in her:

[P]eople were wary of his weaknesses, maybe, and . . . they didn't want to look at him and think that he could be responsible for anything, so it had to all be my fault . . . I was stalking him or I was making advances towards him. (292)

#### B. Decision to Transfer Ms. Lewinsky

Ms. Lieberman testified that, because Ms. Lewinsky was so persistent in her efforts to be near the President, "I decided to get rid of her." (293) First she consulted Chief of Staff Panetta. According to Mr. Panetta, Ms. Lieberman told him about a woman on the staff who was "spending too much time around the West Wing." Because of "the appearance that it was creating," Ms. Lieberman proposed to move her out of the White House. Mr. Panetta -- who testified that he valued Ms. Lieberman's role as "a tough disciplinarian" and "trusted her judgment" -- replied, "Fine." (294) Although Ms. Lieberman said she could not recall having heard any rumors linking the President and Ms. Lewinsky, she acknowledged that "the President was vulnerable to these kind of rumors . . . yes, yes, that was one of the reasons" for moving Ms. Lewinsky out of the White House. (295) Later, in September 1997, Marcia Lewis (Ms. Lewinsky's mother) complained about her daughter's dismissal to Ms. Lieberman, whom she met at a Voice of America ceremony. Ms. Lieberman, according to Ms. Lewis, responded by "saying something about Monica being cursed because she's beautiful." Ms. Lewis gathered from the