

Itemized List of Harold Ickes' Claims of Memory Loss
(questions are paraphrased)
84 Examples

- 1) 9:21 – 10:4; 10:8-11 – How soon after you got the subpoena did you give it to Ms Sabrin?
- 2) 18:11-21 – Were you ever disciplined, suspended or expelled while at Sidwell Friends School?
- 3) 18:22 – 20:1 – Who did you work for in Oregon and California after graduation from Sidwell Friends?
- 4) 20:7 – 21:1 – Why did you leave the University of Arizona after your first year?
- 5) 21:6-11 – Did you have any disciplinary problems at the University of Arizona?
- 6) 22:1-5 – Did you have any disciplinary problems at Stanford?
- 7) 39:4-21 – Did you make and keep personal copies of documents generated during your work for the primary campaign of Governor Clinton?
- 8) 70:2-15 – Have you removed any documents from the 77th Street, New York City facility since placing them in that facility?
- 9) 77:18-78:1 – Who in the White House Counsel's Office gave you the guidance under which you removed the documents from the White House?
- 10) 78:11-18 – Did you take notes of the oral briefing you got from the woman from the White House Counsel's Office who gave you the guidance under which you took the documents from the White House?
- 11) 79:12-16; 79:21 – 80:1 – What did the woman look like who gave you the briefing? How tall was she?
- 12) 79:17-18; 80:18-22 – What was the color of her hair?
- 13) 150:5-11 – What did you talk to Daniel Klaidman about?
- 14) 152:10-14 – Who else, if anyone, did you deal with at Newsweek?
- 15) 156:11-21 – Since February 1998, when was the first time you spoke with the President?
- 16) 158:13-22 – Since January 1998, have you talked to the President about the

Travelgate controversy? (“I don’t recall talking to him at all about Travelgate.”)

- 17) 159:1-6 – Have you talked to the President about the Filegate controversy since January? (“No. Not that I recall.”)
- 18) 163:13-19 – Are you saying the White House or any other source never provided you with the Kathleen Willey letters released by the White House? (“Not that I recall. They may have faxed one or two letters over, but I have no recollection of it, and I don’t think they did.”)
- 19) 164:11-20 – But you may have the Kathleen Willey letters on the premises. Correct? (“I think it is remote beyond belief, because I do not have any recollection whatsoever of any Kathleen Willey letters being faxed to me.”)
- 20) 166:5-8 – The White House provided you with some training or understanding as to what the Privacy Act was? (“I don’t recall that. ... Whatever they briefed us on, they briefed us on.”)
- 21) 173:1-3 – Was anyone else present when you met with Jane Mayer? (“I don’t recall. I don’t think so.”)
- 22) 173:4-10 – What did Jane Mayer say to you? (“I don’t know. I don’t have the foggiest idea. ...”)
- 23) 174:12-14 – Did Ms. Mayer give you any documentation when you met that first time? (“Not that I recall.”)
- 24) 174:15-16 – When did that meeting with Jane Mayer take place? (“I have no idea.”)
- 25) 175:7-15 – What did you discuss during that second possible meeting with Jane Mayer?
- 26) 176:10-15 – Did Jane Mayer ask you whether or not you had information as to whether or not Linda Tripp had ever been arrested? (“She may have, but I don’t recall it.”)
- 27) 177:14-17 – What else did you discuss with Jane Mayer? (“I don’t recall with any specificity.”)
- 28) 179:16-19 – When did you have dinner with Kenneth Bacon? (Initial answer is “I don’t recall.” Then, when asked if it was within the last few months, he answers: “Yes.”)
- 29) 179:20 – 180:6 – Where did you have dinner with Bacon? (Initial answer is “I don’t recall.” Then after being prodded, he answers: “I now recall. It was Steven Cohen and we had dinner at his house.”)

- 30) 185:13 – 186:21 – Have you ever discussed Linda Tripp with President Clinton? (“I don’t have a specific recollection ... I don’t have a general recollection either. ... I don’t have any recollection.”)
- 31) 192:18-193:8 – That’s one time you met with Mrs. Clinton. Where did you meet with her another time? (“I don’t recall whether I met her. As I said, I was very qualified in what I say. I don recall meeting with her once. I may have met with her a second time. ...”)
- 32) 194:10 – 195:6 – What was the passing reference to the Clinton scandals in your conversations with Mrs. Clinton?
- 33) 197:5-16 – What do you remember about your conversations with the President and the First Lady?
- 34) 202:11 – 204:3 – You’ve talked to Rahm Emanuel about Linda Tripp?
- 35) 204:4-8 – You’ve talked to Rahm Emanuel about Monica Lewinsky?
- 36) 204:9-15 – What did you discuss about Kenneth Starr with Rahm Emanuel?
- 37) 204:16 – 205:8 – What did you discuss with the President and the First Lady in the last several months since January about Kenneth Starr?
- 38) 205:9 – 206:2 – Have you had discussions with Sidney Blumenthal in the last months since January of 1998? (“I don’t recall having talked [to] him in the last – but I don’t want to say as a matter of absolute fact that I haven’t.”)
- 39) 206:3 – 207:9 – What did you discuss about Richard Mellon Scaife with various White House officials, including the President and Mrs. Clinton? (“I don’t have any precise recollection of the details of the conversation. ... I have [sic] recollection that I’ve already testified to....”)
- 40) 207:15-17 – What did you discuss about the Arkansas Project?
- 41) 208:15-209:5 – Were the conversations intended to obtain information that could be used to discuss Richard Mellon Scaife in public? (“I don’t know if they – I don’t recall the conversations, that the nature of the conversations or the purpose of the conversations was to obtain information. ...”)
- 42) 210:1-6 – Then what did they tell you about Mr. Scaife?
- 43) 212:10 – 213:7 – Have you discussed Stuart Taylor? (“I don’t recall. I may have. ...”)

- 44) 215:19 – 216:7 – With what reporter did you discuss Joseph diGenova? (“Don’t know when, don’t know where, don’t know what was said.”)
- 45) 217:7-11 – Have you ever discussed with anyone whether Mr. diGenova and his wife could work for CNBC at the same time they were working for Congress? (“I may have. Don’t recall if I have. ...”)
- 46) 217:12-13 – Who did you discuss it with?
- 47) 221:13-18 – Have you discussed Mr. diGenova and his wife with the President and the First Lady? (“I don’t recall having discussion with them. Q: Can’t remember. A: I didn’t say that. I said I don’t recall.”)
- 48) 237:12-16 – Did you discuss Filegate in any way with George Stephanopoulos? (“Not that I recall. Again, I don’t have a definite recollection, but I am quite sure that we did not.”)
- 49) 238:3-5 – Was anything else discussed during the lunch with George Stephanopoulos? (“It could have been. I don’t recall.”)
- 50) 238:12-13 – Where did you have a drink when you met with Mr. Stephanopoulos?
- 51) 238:14 – 239:6 – What did you discuss during that meeting with Mr. Stephanopoulos? (“I don’t recall that either. ... We probably discussed some of them [the Clinton scandals]. What they were, I don’t recall.”)
- 52) 243:2-19 – Have you ever discussed gathering information about Clinton critics with anyone in the last six months? Do you have a general recollection? Just so we’re clear, you don’t have any memory about that? (“Not that I recall. I may well have, but I don’t have any specific recollection. ... I don’t even have a general recollection.”)
- 53) 246:6-8 – Did James Carville tell you don’t worry about the Judicial Watch deposition? (“I do not recall him saying that.”)
- 54) 247:7-17 – What other conversations have you had with Mr. Carville in the last six months? (“I can’t remember. ...”)
- 55) 257:18 – 258:17 – Did George Stephanopoulos tell you to what the Ellen Rometsch strategy refers? (“I don’t recall having a discussion with him about this; and may have, but I don’t recall it.”)
- 56) 282:3-21 – Did you discuss the Filegate controversy with Mrs. Clinton? (“I may have. ... I’m not saying I didn’t talk to her about it, but I have no specific recollection of talking to her about it. ... I don’t even have a general recollection.”)

- 57) 288:6-17 – Have you ever been questioned about Filegate by Independent Counsel Ken Starr’s office? (“... I could not testify with any degree of accuracy whether I had never been asked about it. I don’t recall.”)
- 58) 288:18-21 – Do you recall whether you have ever been questioned by anyone in the House of Representatives about Filegate?
- 59) 288:22 – 289:1 – Do you recall whether you have ever been questioned by anyone in the Senate about Filegate?
- 60) 301:13 – 303:1 – Have you ever seen this document before? (Ickes Depo. Exhibit No. 7: The Jane Sherburne Task List of December 1994, published in the *Wall Street Journal* September 6, 1996)
- 61) 306:1 – 307:9 – Did you discuss the issue about your prior involvement with unions who had Mafia ties with Jane Sherburne? (“I have no specific recollection of discussing it with her.”)
- 62) 330:20 – 331:5 – Whether or not the FBI files issue was discussed in the White House in December 1994. (“I don’t recall it being discussed. I’m not saying it couldn’t have been. Jane had a pretty broad purview. I don’t recall FBI files being discussed.”)
- 63) 331:6-10 – Do you recall security issues and Craig Livingstone being discussed in December 1994?
- 64) 333:18 – 334:4 – Around December 1994, was there any discussion that you know of about Privacy Act materials and Craig Livingstone in general? (“I don’t recall any specific or general discussion about that. I mean Privacy Act may have been mentioned. I have no specific recollection about it. But the Livingstone thing is a mystery to me.”)
- 65) 337:18 – 338:9 – Was there ever any discussion as to what would be a personal file in terms of how files are kept in the White House when you were there or thereafter? (“Not that I recall. ... But I don’t recall any specific discussion about personal files. ...”)
- 66) 344:21 – 345:4 – You are aware that as part of his duties and responsibilities William Kennedy reviewed FBI files from time to time? (“I may have been aware of that and may well have forgotten it. I couldn’t testify to a fact right now.”)
- 67) 345:9-12 – Did you ever discuss whether FBI files were taken out of Vince Foster’s office with anyone up to today? (“I may have.”)
- 68) 345:17-20 – With whom did you discuss whether FBI files were taken out of Vince Foster’s office? (“I don’t recall. ...”)

- 69) 355:2-11 – Had you ever heard it from anybody outside of the public press that Mrs. Clinton had highly recommended Craig Livingstone? (“I don’t recall it, and I don’t believe it.”)
- 70) 355:12-21 – You have discussed with Mrs. Clinton who recommended Craig Livingstone, haven’t you? (“I don’t think so. ... I may have had passing conversation with Mrs. Clinton about him, but I for the life of me, I can’t recall what it was either specifically or generally as we sit here today under oath.”)
- 71) 355:22 – 356:3 – You had conversations with the President about Craig Livingstone, didn’t you? (“No. Not that I recall.”)
- 72) 356:4-8 – You had conversations with Jane Sherburne about Craig Livingstone, didn’t you? (“Again, I can’t recall the specifics, Mr. Klayman, but I probably did.”)
- 73) 356:9-10 – What did you discuss during your conversations with Jane Sherburne about Craig Livingstone?
- 74) 379:17- 380:7 – In the several months leading up to June of 1996 did anyone come around and say, “Look, if we turn (Billy Dale’s) file over to Clinger there’s going to be some questions raised?”
- 75) 380:15 – 381:10 – But before it was raised by Clinger, wasn’t there a discussion or communication in the White House that “We may have to answer some questions about FBI files” before it ever became known by Clinger? (“I don’t recall that. ... There may have been, Mr. Klayman. I don’t have any specific recollection of it, but there may have been. ...”)
- 76) 385:6-13 – When you were Assistant to the President and Deputy Chief of Staff, did you ever communicate with Howard Shapiro or his office in anyway?
- 77) 400:5-13 – Was it that people in the conversation were pleased that Dick Morris had filed the affidavit saying that he was only talking about polling data to Sherry Rowlands? (“[T]his happened almost coming up on two years ago. I’ve done a lot since then. I do not remember the specifics of what the concern was.”)
- 78) 403:4-8 – Were you interviewed by any of Kenneth Starr’s people in and around September 1996?
- 79) 413:13-15 – Did anyone discuss who had hired Craig Livingstone during this call?
- 80) 417:16 – 418:2 – Do you know what the American people were thinking about that issue? (Hillary Clinton’s alleged responsibility for Filegate.) (“I think, I don’t recall specifically....”)

- 81) 451:4 – 452:22 – Have you ever seen this set of documents before (documents from Ickes document production entitled “Fact Sheet on FBI Files Obtained by the White House”)? (“I don’t recall it as I sit here today. But if it came from my files, I probably saw it. Not everything in my files I saw.”)
- 82) 458:8-16 – When you were at the White House, I take it there were discussions that it was best to let the lawyers do the fact gathering because if ever there were any questions asked you could claim attorney-client privilege. (“I’m sure that there were discussions like that. I don’t recall any particular discussions along those lines.”)
- 83) 466:1-5 – Was there anyone else present, aides, assistants, anybody like that (during a meeting between Jane Sherburne, Leon Panetta, Jack Quinn and Ickes)? (“I don’t recall. I suspect not. I think these kinds of meetings were closely held.”)
- 84) 467:2-10 – With regard to Filegate discussions in which he participated with anybody at the White House, after his meeting with Leon Panetta in which he, Jane Sherburne and Jack Quinn recommended that somebody other than the WH investigate the FBI files matter, Ickes cannot recall when such discussions occurred, where they occurred, who participated and what was said.
-