

1 otherwise occupied, also Lisa could have, also Craig could
2 have, anyone in the office could have.

3 Q Was it, well, start with you, was it your
4 understanding that whenever a file was to be taken out of
5 the office someone--

6 MR. SRERE: Let me clarify.

7 MR. HIRSHLAND: Sure.

8 MR. SRERE: You're talking about files and my
9 understanding of the testimony so far, these are not files
10 that are being checked out, these are background
11 investigations that are being checked out and they are not a
12 complete file. And I believe that's what Ms. Anderson has
13 testified. So--

14 MR. HIRSHLAND: That could be a very helpful
15 clarification.

16 Take the first entry--by the way, we are following
17 the practice of not mentioning any individuals' names in the
18 left-hand column which is for privacy reasons.

19 BY MR. HIRSHLAND:

20 Q So, take the first entry here as an example, July
21 19th. When it says, that that particular file was checked
22 out, what is meant is that just a background investigation
23 was taken out?

24 A No. If you read this whole first line it says
25 that it was the SF-86 form that was checked out.

1 Q Okay. How about the other entries? Go to the
2 second one, it just says--

3 A That would have been the return background
4 investigation and then if you go down a little bit further
5 you can see that--

6 MR. SRERE: I'll point to it. 9/21/93.

7 THE WITNESS: 9/21. You can see that there were
8 two BIs that were checked out because she had a partial and
9 then a follow-up that completed it. The FBI practice was
10 they had a certain time frame that they had to return
11 something back. And if the background had not been fully
12 completed, a partial would be returned and a follow-up would
13 be forthcoming.

14 BY MR. HIRSHLAND:

15 Q Okay. I see further down there's three entries
16 there dated on October 12th, and it appears on the column,
17 it says, it's hard to read but it appears to say memos only.
18 Do you know what that reference is to?

19 MR. SRERE: It's hard for--I am just stating, I'm
20 not sure that says memos only.

21 MR. HIRSHLAND: Okay.

22 MR. SRERE: But if Ms. Anderson recalls or can--

23 MR. HIRSHLAND: If you don't, that's entirely
24 fine. It's not a critical piece.

THE WITNESS: I do not know.

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1 MR. HIRSHLAND: Okay.

2 BY MR. HIRSHLAND:

3 Q So, unless otherwise noted, if the only
4 information in the log is an individual's name and then the
5 name of whoever checked it out, and George Saunders most
6 often, and then a date and then returned and then perhaps a
7 date and some initials.

8 If that's the only information there and there's
9 no other information that, therefore, represents that a BI,
10 a background investigation was checked out of the Office of
11 Personnel Security?

12 A Hmm-hmm.

13 Q And no other information from--

14 A No other information.

15 Q --a personnel file.

16 That's a helpful clarification, thank you.

17 Having made that clarification, was it your
18 understanding that whenever a BI was removed from the Office
19 of Personnel Security that a notation must be made in this
20 log?

21 A Hmm-hmm.

22 Q Did you understand that the other individuals in
23 the office, Craig Livingstone, Tony Marceca, Lisa Wetzl, Ed
24 Hughes, shared that same understanding?

25 A Yes. But there's one thing that you need to know.

1 At the beginning of this, I am not sure Tony was even in the
2 office. He was only detailed to our office for six months.

3 Q Okay. Do you recall whether he ever actually made
4 entries in this log?

5 A I don't think so, but I don't remember
6 specifically.

7 Q Okay. Well, why don't we then set Mr. Marceca
8 aside for a second and say the other individuals in the
9 office, who were staff members.

10 A That was the understanding.

11 Q Okay.

12 A Anyone who currently, at that time, was a staff
13 member.

14 Q Okay. I see that--

15 MR. SCHANZER: Before you go to the next page I
16 have a question.

17 MR. HIRSHLAND: Sure.

18 MR. SCHANZER: Are all these entries on here your
19 handwriting?

20 THE WITNESS: No.

21 MR. HIRSHLAND: We're referring to page one at
22 this point.

23 MR. SCHANZER: Okay. Could you indicate what's
24 not your handwriting?

25 THE WITNESS: All of this up to right here.

1 MR. SRERE: Approximately 10/12/93.

2 THE WITNESS: 10/12.

3 MR. HIRSHLAND: Okay, that's the second entry
4 dated 10/12, is that correct?

5 THE WITNESS: The second entry, maybe the first,
6 but I'm not 100 percent sure. I dont think that's mine.
7 So, the 10/12 entries down to I think the second to the last
8 one looks like mine. And, so, the last two entries.

9 MR. SRERE: That block of people are not your
10 handwriting, is that correct?

11 THE WITNESS: That block is not mine.

12 MR. SCHANZER: The 10/12 block?

13 MR. SRERE: Right.

14 THE WITNESS: The 10/12 block down to the second
15 to the last.

16 MR. SCHANZER: And the last two are your
17 handwriting?

18 THE WITNESS: The bottom one definitely and the
19 second one looks to be.

20 BY MR. HIRSHLAND:

21 Q Do you have any recollection who the others, who
22 might have checked out the others?

23 A No.

24 MR. SRERE: The question was broad. Look at the
25 return column, are all those your handwriting on the return

1 column?

2 THE WITNESS: No.

3 MR. SRERE: I take it the block from approximately
4 9/8 through 10/12--

5 THE WITNESS: Up to the block of date returned up
6 to 8/25 would have been mine.

7 MR. SCHANZER: Do you know whose handwriting is
8 subsequent to that?

9 THE WITNESS: No.

10 MR. SRERE: And I just want to point out for the
11 record, we haven't done a detailed, we are sitting here
12 giving you a general idea of some people. Some handwriting
13 on here was not Ms. Anderson's. But for instance, you just
14 said a block up to 8/25, but I'm pretty sure the block of
15 8/20/93 is not her's, in the return column.

16 THE WITNESS: Oh.

17 MR. SRERE: So, I mean I just want to make sure
18 the record's straight so she's not saying that everything
19 else on the page is her handwriting and just to give you a
20 general idea it's not all her handwriting.

21 MR. HIRSHLAND: That's helpful.

22 THE WITNESS: I'm interspersed.

23 MR. HIRSHLAND: David, do you have any other
24 questions about this page?

25 MR. SCHANZER: No.