

1 answer is, no, but let me ask the question. Did you have a
2 responsibility to ensure that other staff members were
3 making entries in the log when they were present and files,
4 and BIs were being removed from the office?

5 A Did I have a responsibility to make sure that when
6 they weren't present that the files--

7 Q When they were present.

8 A --were being checked out?

9 Q In other words, that the log was at all times
10 being kept in a consistent, regular fashion.

11 A The responsibility for that, based on the way that
12 you phrased it, would have been mine and Craig's
13 responsibility.

14 Q Okay.

15 MR. SRERE: She heard your question that the other
16 members were out of the office and the only people left in
17 the office were Craig and Ms. Anderson. Now, I think she
18 said as clearly as possible that when she wasn't in the
19 office, it was up to the people who were in the office to
20 make sure the log was filled out correctly. If she was in
21 the office when the BI was checked out, it was her
22 responsibility if she was there and the person seeing that
23 it was being done to make sure it was filled out correctly.

24 BY MR. HIRSHLAND:

25 Q So, you didn't understand yourself to have any

1 additional responsibility to make sure that other
2 individuals kept the log--

3 A I think--

4 Q --sufficiently?

5 A --stated that if I was in the office but,
6 otherwise, occupied I made sure that before George and he
7 was primarily the one who walked out with the
8 investigations, or Bill Kennedy, that someone made a log
9 entry and that that background went to that specific person.
10 If I was not in the office then whoever was in the
11 office had that responsibility. It was a shared
12 responsibility among all staff members.

13 Q Did you ever have conversations with other
14 individuals in the office that they should be sure to
15 diligently check out to make entries in the log whenever BIs
16 were removed from the office?

17 A Yes. Per Craig it was to be stated to the staff
18 that when we established this log that every background
19 investigation was to be logged out. That was the system
20 that we came up with in July.

21 Q That Mr. Livingstone made clear that--

22 A Yes.

23 Q --every time a BI was checked out it was to be
24 entered into the log?

25 A Yes.

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1 Q Did he ever change that, those instructions?

2 A Not to my knowledge.

3 Q Okay.

4 MR. SRERE: You're asking during the time she was
5 there?

6 MR. HIRSHLAND: Correct.

7 MR. SCHANZER: Could we just go through the page
8 prior to the one you are looking at?

9 Could you indicate which--and I'm only interested
10 in the name column, but you will refer to them by date--
11 which of these are handwriting that are not yours?

12 THE WITNESS: That is not mine?

13 MR. SCHANZER: Okay. The first four, let's say,
14 are those yours, is that your handwriting?

15 THE WITNESS: Yes.

16 MR. SCHANZER: How about the next four that is in
17 a little bit darker, it might be a different pen, but I want
18 to know is that your handwriting, the ones on 11/8--

19 THE WITNESS: It looks to be but I'm not 100
20 percent sure. The next four?

21 MR. SCHANZER: Yes. Then how about the ones from
22 there to the bottom of the page, are they of those not in
23 your handwriting?

24 THE WITNESS: That whole page looks to be my
25 handwriting. The one--yeah, that looks to be mine.

1 MR. SCHANZER: Okay. How about the following
2 page, starting with the entry on 1/24/94, and go down and
3 indicate by date which, if any, of these entries are not
4 your handwriting?

5 THE WITNESS: The bottom--

6 MR. SRERE: Start at the top.

7 THE WITNESS: Okay. All but the bottom two look
8 to be my handwriting.

9 The ones at 3/14 do not look to be mine.

10 MR. SCHANZER: Okay. How about on the next page?

11 THE WITNESS: They look to all be mine.

12 MR. SCHANZER: Okay.

13 BY MR. HIRSHLAND:

14 Q Whenever you're ready. Actually, we can pick
15 right up on the page where we left off. The last dated
16 entry was 3/29/94.

17 Are you with me on the log?

18 A Uh-huh.

19 Q It appears as if the last entry on that page would
20 have been made on 3/29/94.

21 A Or a date thereafter.

22 Q Well, I'm assuming that these are quotation marks
23 to indicate 3/29/94.

24 MR. SCHANZER: Why don't we do that for the
25 record. What did that mean?

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1 THE WITNESS: The quotation marks meant that--if
2 you notice, at 3/29, next to it, it says who the file went
3 to. It was Beth Nolan/Clarissa Cerda; that it went to those
4 two individuals. And then there's quotation marks all the
5 way down to the last name entered. That meant that all of
6 them went to that specific--those two specific individuals
7 on that date, and that those would have been all the ones to
8 that date.

9 BY MR. HIRSHLAND:

10 Q Were you ever instructed or told not to make
11 entries in the log or to stop keeping the log?

12 A No.

13 Q Are you aware of anyone else in the office ever
14 being told not to make entries or stop keeping the log?

15 A No.

16 Q Okay. Based on your description, it appears that
17 the last entry on this page was March 29, 1994.

18 A Uh-huh.

19 Q And the first entry on the next page of the copy
20 we have at least is September 21, 1994.

21 A Uh-huh.

22 Q Is that your handwriting on September 21st?

23 A No. I had already left the office by then.

24 Q Do you recall exactly when you left the office?
25 Sometime in September '94?

1 A I would say I think it was sometime--I don't
2 remember the exact date.

3 Q But it was prior to September 21, 1994?

4 A Well, the last month that I worked at the White
5 House, I was working with the Public Liaison Office. I was
6 not working with the White House Security Office.

7 Q Okay. Do you recall when you left the White House
8 Security Office?

9 A I would--a month before my final day.

10 Q Before September 21, 1994?

11 A Yes, before then.

12 Q Okay.

13 A Because none of this handwriting is mine.

14 Q Well, it appears, at least from the copy of the
15 log that we have, there is a 6-month gap, roughly, between
16 March 29, 1994, and September 21, 1994.

17 Do you recall during that period whether any files
18 would have been checked out?

19 MR. SRERE: Any BI's would have been--

20 BY MR. HIRSHLAND:

21 Q Any BI's would have been checked out from the
22 office?

23 A I recall that background investigations were
24 checked out and that we did log them.

25 Q Do you have any idea why there are no entries on