

1 that would be in the BI necessarily?

2 THE WITNESS: No. That would--sometimes it would
3 be. Sometimes it would not be. Whether or not they were in
4 good standing with the IRS, sometimes it would. Sometimes
5 you wouldn't hear about it.

6 BY MR. HIRSHLAND:

7 Q Ms. Anderson, I want to be as fair about this as
8 possible. Certain individuals, an individual or
9 individuals, have suggested that the record-keeping in this
10 log during the period from July 1993 through March of 1994
11 was spotty, less than 100-percent complete, at least
12 implying that there were instances where BI's were taken out
13 of the office by individuals other than Mr. Livingstone, but
14 no record was made.

15 Would you do us a favor of just looking through
16 those pages and telling us whether you can identify any
17 seeming lapses or gaps or missing entries in the period
18 between July 1993 and March 1994?

19 MR. SRERE: I'm going to make a couple of comments
20 on that. First of all, we're not privy to whatever
21 information you've had. So it's difficult for us to assess
22 the veracity, credibility. I'm sure you're not purposely
23 making any misrepresentation about what people have said.

24 Second, you're asking her to go back now and look
25 at a log and try to remember specific BI's that were checked

1 out, but did not make it into the log? I mean, is that what
2 you're asking her to do, 3 years later?

3 MR. SCHANZER: Doesn't the document speak for
4 itself? I'm not sure.

5 MR. HIRSHLAND: Well, the document, most
6 certainly, does not speak for itself. We have--we don't
7 know whether, in fact, there were BI's that were checked out
8 other than those indicated.

9 BY MR. HIRSHLAND:

10 Q I'm just asking if you have any specific
11 recollection that would lead you to tell us that, in fact,
12 during that period, some logs were taken out that weren't
13 recorded. I mean--

14 MR. SRERE: I think she specifically said that
15 whenever she was there, she took it on as a responsibility
16 to make sure that they were signed out under the log, and so
17 if that question is whether--it seems to me you're asking
18 that same question a different way.

19 MR. HIRSHLAND: No, it's a slightly different
20 question.

21 BY MR. HIRSHLAND:

22 Q It's whether you're aware of any files that were
23 checked out, and you don't see them recorded here.

24 A And as I've previously stated earlier, I don't
25 remember, and I have no recollection of files being taken

1 out that were not put in the log, other than those instances
2 I already told you.

3 Q Right. I want to make it clear. I am certainly
4 not trying to badger you. I am just trying to establish for
5 the record whether it's your impression.

6 I understand that it can't be a perfect
7 recollection, but it's your impression that the period from
8 July 1993 through March of '94 is complete to the best of
9 your knowledge.

10 A I would have to say it's more than just an
11 impression that, yes, this is as complete as I can remember
12 back 3 years to the little specifics.

13 Q Okay. That's fine. I mean, I'm not expecting you
14 to recall every individual file that was checked out.

15 Based on what you're telling us, it appears to me
16 as if there are pages missing from the log.

17 MR. SRERE: Specifically between--

18 MR. HIRSHLAND: March 29th.

19 MR. SCHANZER: --March 29, 1994, and the next page
20 that you have in this copy, 9/21/94?

21 MR. HIRSHLAND: Right.

22 BY MR. HIRSHLAND:

23 Q Is that a fair assumption on my part, do you
24 think? Would you agree that that is the appearance?

25 A I believe I stated earlier that, yes, I remember

1 A Perhaps in June.

2 Q Do you recall any specific BI's, that is, the
3 individuals whose BI's were checked out?

4 A No.

5 Q You don't.

6 A I just--I remember that it was an ongoing process
7 of George doing the interviews and doing the follow-ups.

8 Q Okay. I may have already asked you this, but I
9 want to make sure that I clarified. Did Mr. Marceca make
10 entries in the log?

11 A No, not to my knowledge. He did not.

12 Q I understand that Mr. Marceca's detail ended in
13 February of '94, and you stayed on for a number of months in
14 the office, at least through August of '94.

15 A I stayed on the payroll through August of '94.

16 Q Through September of '94, on payroll.

17 A Through September of '94. The month prior to my
18 last day, I was in--I was working in the Public Liaison.

19 Q Okay.

20 A I can't remember the exact day.

21 Q Okay, that's fine, but through sometime in mid to
22 late summer of '94, you were still in the Office of
23 Personnel Security?

24 A Uh-huh.

25 Q Do you recall during the period between when Mr.

1 keeping the log, and that there appeared to be pages not
2 there.

3 Q And do you have any recollection of any
4 discussions with anyone that might bear on pages, the fact
5 that pages were taken out of the log?

6 A I believe I earlier stated no.

7 Q Okay. Have you ever discussed this log with
8 anyone from the White House since your departure from the
9 Office of Personnel Security?

10 A No.

11 Q Do you recall having discussion about this log
12 with anyone else since your departure?

13 MR. SRERE: Besides counsel.

14 THE WITNESS: No.

15 Is there a rest room near?

16 MR. SRERE: Let's take a break.

17 MR. HIRSHLAND: Let's take a break.

18 [Recess.]

19 BY MR. HIRSHLAND:

20 Q Ms. Anderson, I just have a couple more questions
21 about this log.

22 A Uh-huh.

23 Q At one point, you told us that you specifically
24 recall that you did make entries in the log, I believe you
25 said, in May of '94 and perhaps in June. Is that correct?

1 A No.

2 Q You also told us that you had no independent
3 knowledge or personal discussions with the White House
4 of--no. Let me rephrase this. You had no independent
5 knowledge about anyone actually removing pages from the log.
6 Is that correct?

7 A No, I do not.

8 Q Have you had any discussions with anyone in which
9 you were told about individuals removing pages of log?

10 A No.

11 Q Has your attorney told you that individuals
12 removed pages from the log?

13 MR. SRERE: I instruct you not to answer that
14 question.

15 MR. HIRSHLAND: Okay. On what grounds?

16 MR. SRERE: Attorney-client privilege.

17 MR. HIRSHLAND: Okay. I have no other questions
18 about the log. I have a number of additional questions.
19 David, would you like to ask some more questions?

20 MR. SCHANZER: You just go ahead, and I'll ask my
21 questions.

22 MR. SRERE: I'd also like to state for the record,
23 when people are reading this, that last question, it should
24 not be taken as any way that any discussions were had. As
25 everyone knows, the attorney-client privilege is a very

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