

1 to Pat Nelson. He would send it to JoAnne Hilton.

2 MR. HIRSHLAND: We have some copies of some memos
3 that might be what you are describing, I would like to show
4 them to you and see whether they are, in fact. Why don't we
5 just take what is Bates Stamped CGE-056094 and enter that as
6 Exhibit Number 1.

7 [Anderson Deposition Exhibit
8 No. 1 was marked for
9 identification.]

10 BY MR. HIRSHLAND:

11 Q Do you recognize this document?

12 A Hmm-hmm.

13 Q Would you describe it for us?

14 A A memo requesting that the SF-86 packet be filled
15 out as their BIs had expired.

16 Q Is this or is this not the type of memo that you
17 were just referring to that Mr. Marceca would draft?

18 A This looks like a memo that Nancy drafted.

19 Q Okay.

20 MR. SCHANZER: What makes you say that?

21 THE WITNESS: The way it's typed.

22 BY MR. HIRSHLAND:

23 Q Could you elaborate a little bit on that?

24 A Nancy always used the typewriter and Tony always
25 used a computer and this looks to be as if it is off of a

1 files were requested from the FBI or after files were
2 requested from the FBI, to your knowledge?

3 THE WITNESS: This looks, since it has last BI
4 dates, to be sent after.

5 MR. SCHANZER: Because otherwise there would be no
6 way to know when they left the FBI?

7 THE WITNESS: Otherwise there'd be no way to know.

8 MR. SCHANZER: Okay. Now, you also discussed some
9 sort of memos that you thought were sent to the NSC or to
10 GSA or whatever before FBI files were sent.

11 THE WITNESS: My recollection, obviously, was not
12 correct because I assumed or remembered that memos were sent
13 before the BIs were requested.

14 MR. SRERE: I just want to make sure for the
15 record, because we're just looking at one memo here, and
16 maybe, I have no idea, but it may be possible there is
17 another memo out there, is it possible that there's another
18 memo out there that is along the lines of your first
19 recollection that they were sent out before the FBI files
20 came back?

21 THE WITNESS: It is possible but I believe that
22 Tony was following the same form that Nancy had set up and
23 as I said before, I really got a brief overview.

24 MR. SCHANZER: Let me get this straight though.
25 You left the Office of Personnel Security at some point

1 record, please?

2 MR. SCHANZER: Okay. This is a document a memo to
3 Bob Manzanares, NSC, at the bottom it's stamped 00124.

4 And why do you think this is one of Mr. Marceca's
5 memos?

6 THE WITNESS: Because if you will notice it's more
7 consistent with what would be printed out on a computer as
8 to what would be printed out on a typewriter. It's margins
9 are wider than--and Nancy kept very strictly to this
10 document of CGE-056094 format where--I mean if you look at
11 the two side-by-side you can tell that there's a definite
12 difference.

13 MR. SCHANZER: Okay. And what, to the best of
14 your understanding, what is this document, what was its
15 purpose?

16 MR. SRERE: The 124.

17 MR. SCHANZER: I'm talking about number 124.

18 THE WITNESS: This would be, it seemed to me to be
19 Tony asking if these people were still with the NSC and if
20 they were they needed to fill out an SF-86.

21 MR. SCHANZER: Okay. Now, was this the type of
22 memo that you were talking about before that was part of
23 Project Update?

24 THE WITNESS: Yes.

25 MR. SCHANZER: And would this memo be sent before

1 MR. SCHANZER: Right. Is it possible that Mr.
2 Marceca requested all the files that were on the Secret
3 Service list and then went back to the agencies later and
4 asked if these people were still there? Is that maybe the
5 way this thing happened?

6 THE WITNESS: That's very possible.

7 MR. SCHANZER: Get files first, ask questions
8 later?

9 THE WITNESS: Very possible.

10 MR. SCHANZER: Why don't you continue?

11 [Anderson Deposition Exhibit
12 No. 3 was marked for
13 identification.]

14 BY MR. HIRSHLAND:

15 Q Ms. Anderson, I would like to show you another
16 document and it appears a two-page document, Bates Stamped
17 CGE-056057. I will just give you the first page. It's
18 unclear whether the second page is supposed to be part of
19 that document or not.

20 Do you recognize this document?

21 A Not specifically but I recognize that it would
22 have been done.

23 Q Okay. It appears as if you signed next to Mr.
24 Livingstone's name there, what would that have--

25 A If you read the whole thing it has Craig's name

1 before you left the White House to work in the public
2 liaison office, is that correct?

3 THE WITNESS: That was the last month I was there
4 I had already handed over my workload to Lisa and to Ed
5 Hughes.

6 MR. SCHANZER: So, that would have been from part
7 of September and any of August of '94? Excuse me, of '94.

8 MR. SRERE: '94.

9 MR. SCHANZER: Okay, '94, now I'm getting
10 confused.

11 THE WITNESS: It would have been that last month
12 and basically I got bored sitting around waiting for
13 questions that they had. They had no questions. They
14 seemed to have grasped--

15 MR. SCHANZER: It's irrelevant. I got my years
16 confused because Marceca started in '93. So, you would have
17 been there the whole time that Marceca was doing this
18 Project Update?

19 THE WITNESS: Yes.

20 MR. SCHANZER: Okay. Now, what leads you to
21 believe that Mr. Marceca went to the agencies first and
22 asked who was there before he requested FBI files?

23 THE WITNESS: That was the way I remembered it.
24 Just simply the way I remembered it.

25 I mean it was three years ago.

1 and it says Mari Anderson for CL, which would have been
2 Craig Livingstone.

3 Q I was just going to ask you who Lou is. It says,
4 for, okay.

5 A That's why I never wrote in cursive.

6 Q Can you just describe what that indicates?

7 A That Craig was probably at this time out of the
8 office as he would randomly, throughout my tenure in the
9 White House, go on advance trips for the President and when
10 he was out of the office and the day-to-day functions, he
11 signed off on most of the memos that went out under his
12 name. If he was out, I signed for him.

13 Q Do you recall whether you drafted this document?

14 A No, I do not.

15 Q Do you recognize whether any of the notations on
16 this page are yours?

17 A They are, none of them are mine, other than my
18 signature.

19 Q Okay. Can you describe to us, to the best of your
20 recollection, what this document is and what your
21 involvement with it was?

22 A My involvement--well, first of all, the document
23 is the same as the previous two documents, a request saying
24 we have these investigations, they need to be updated, are
25 these people still here?

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