

1 MR. SCHANZER: Because there is no reason you
2 would have wanted to receive inactive pass holders, right?

3 THE WITNESS: No.

4 BY MR. HIRSHLAND:

5 Q Again, assuming that he would request a list of
6 active pass holders only, but you said you weren't sure with
7 respect to particular lists that that's what he requested.

8 MR. SCHANZER: You have asked questions for four
9 hours. I would like to try to ask a line of questioning
10 that is clean and is chronological and if you wouldn't mind
11 following up on those questions I would appreciate it.

12 MR. HIRSHLAND: Well, just clarifications and
13 statements that you, yourself--

14 MR. SCHANZER: You're not clarifying, you're
15 actually talking about a different thing. Because she said
16 that this was typical of a routine list. Not the one that
17 was requested for Project Update that it was provided by the
18 Secret Service. How often?

19 THE WITNESS: It was supposed to be monthly.

20 MR. HIRSHLAND: But, David, she said earlier that
21 she wasn't certain whether the list that was provided
22 monthly was for the list for active only or not.

23 THE WITNESS: Without having seen it.

24 MR. HIRSHLAND: You're not certain; correct?

25 THE WITNESS: No. Without having seen it because

1 I don't think at that time I had had it in front of me to
2 say whether or not the list was active or de-active. Our
3 working understanding in the office was that if we received
4 a list like this that just had a name and what kind of pass
5 it was that it was active.

6 [Anderson Deposition Exhibit
7 No. 5 was marked for
8 identification.]

9 MR. SCHANZER: I'm going to give you another list
10 and it has been marked as Anderson Deposition Exhibit No. 5.

11 And is this list in the format of the lists that
12 were used to conduct Project Update?

13 THE WITNESS: No.

14 MR. SCHANZER: Okay. Why is that?

15 THE WITNESS: If I remember correctly this would
16 be a type that would be very similar but there would also be
17 a--I can't remember specifically the list but I do recall
18 that there was a column that said White House operations NSG
19 or what not. I don't remember specifically--

20 MR. SCHANZER: That for each name it indicated
21 what office they were in?

22 THE WITNESS: Under what umbrella they fell.

23 MR. SCHANZER: And would that list have had a
24 column I and A, active, inactive status?

25 THE WITNESS: I do not remember.

1 MR. SCHANZER: If it had had a column I and A,
2 then you wouldn't have needed to go back to the agency to
3 figure out who was working there, would you have?

4 THE WITNESS: No.

5 MR. SCHANZER: Okay.

6 So--

7 MR. SRERE: I would also like to point out that
8 Exhibit No. 5 has temporary passes on it and I believe her
9 testimony was the list that they got for Project Update had
10 only active, permanent passes, is that correct?

11 THE WITNESS: Yes.

12 MR. SCHANZER: Okay.

13 This list has a column for date of birth and place
14 of birth. Is it your understanding that that's information
15 that was necessary to do Project Update?

16 THE WITNESS: Yes.

17 MR. SCHANZER: Okay, why is that?

18 THE WITNESS: Because you have to have an
19 identifier other than a name for the FBI and two of the
20 identifiers, three of the identifiers that they would
21 request would be Social Security number, a date of birth and
22 a place of birth

23 MR. SCHANZER: Let me direct your attention to
24 right under where it says, WAVES?

25 THE WITNESS: Yes.

1 MR. SCHANZER: The document says, exclusive
2 employer directory for miscellaneous non-government
3 employees. And is it possible that the Project Update lists
4 indicated on the top of the page what office these
5 individuals were from?

6 THE WITNESS: I don't believe so, but I don't, I
7 can't say with any certainty of what the list title would
8 have been.

9 MR. SCHANZER: Okay.

10 But you're sure that this is not the type of list
11 that you were getting from the Secret Service to do Project
12 Update?

13 THE WITNESS: I don't remember this being the
14 list. I remember there being another column saying what
15 office they were in.

16 MR. SCHANZER: Okay.

17 I'm going to show you a big thick book and we are
18 not going to mark it as an Exhibit but it has been known as
19 the master WAVES list. And have you seen print-outs such as
20 this before in the Office of Personnel Security?

21 THE WITNESS: I've seen print-outs, yes.

22 MR. SCHANZER: In exactly this format?

23 THE WITNESS: In this format and a lot of various
24 formats. There were a lot of lists that were given to our
25 office.

1 MR. SCHANZER: Okay.

2 In those of one column it says status on the top.

3 And A and I.

4 THE WITNESS: Hmm-hmm.

5 MR. SCHANZER: If you had had access to a list
6 like this, couldn't you have used something like this to
7 determine if individuals were active or inactive instead of
8 the method that was used?

9 THE WITNESS: Yes.

10 MR. SCHANZER: And why--

11 MR. SRERE: Assuming that this list would have
12 those people as inactive.

13 MR. SCHANZER: Okay.

14 Well, was it your understanding that the Secret
15 Service could produce a list for you which indicated whether
16 individuals were, indeed, active or inactive?

17 THE WITNESS: As far as the Project Update? Or as
18 far as--

19 MR. SCHANZER: No. Just in terms of your
20 understanding of what they could produce for you for any
21 list?

22 THE WITNESS: What I was told is they could
23 produce for us whatever combination whatever
24 project we were working on. Which ere
25 doing Project Update we asked for ac ass

active

1 holders.

2 MR. SCHANZER: So, the list you would have
3 received then wouldn't have had a separate column indicating
4 active or inactive because you would have assumed they would
5 have all been active, is that correct?

6 THE WITNESS: Yes.

7 MR. SCHANZER: I believe we discussed before that
8 at some point there was some confusion or some awareness
9 that names on the list were people who were no longer at the
10 White House, is that correct?

11 THE WITNESS: Hmm-hmm.

12 MR. SCHANZER: And some effort was made to sort
13 out who were still employed and you need files on and who
14 were not, is that correct?

15 THE WITNESS: Hmm-hmm.

16 MR. SCHANZER: You have to make an audible
17 response.

18 THE WITNESS: Oh, yes.

19 MR. SCHANZER: And I guess my question to you is
20 if you had seen lists like this log book before--and we have
21 been told that this is a Secret Service list that has every
22 active or inactive pass holder for the past 10 years or 8
23 years, excuse me--were you aware that the Secret Service was
24 capable of providing you with that kind of document?

25 THE WITNESS: I was aware that the Secret Service

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