

1 A Hmm-hmm.

2 Q Do you recall, was that while you were still  
3 working there?

4 A Yes.

5 Q Do you recall roughly when that would have been?

6 A No. Because we, we had to fight for it.

7 Q Okay. At some point, did you receive a computer?

8 A Yes.

9 Q Did your computer have the capability to send E-  
10 mails?

11 A Yes.

12 Q Did you have the capacity to send E-mails outside  
13 the White House?

14 A Everybody had that capacity.

15 You just had to log-on to the Internet.

16 Q Okay. And do you recall who else had a computer  
17 while you were employed in the Office of Personnel Security?

18 A Lisa Wetzl, and then Tony brought in a computer, a  
19 little laptop.

20 Q Do you know whether he had E-mail?

21 A It was not connected to the network.

22 Q Okay.

23 A Which was the only way you could get the E-mail or  
24 the Internet.

25 And to my recollection, eventually we had another

1 computer that Ed, I can't remember Ed's last name--

2 Q Hughes?

3 A Hughes.

4 Q Okay. Did Mr. Livingstone have his own computer?

5 A No. He refused to use computers.

6 Q Are you familiar with something called the  
7 security tracking system?

8 A Is that the one on the 1970 Wang?

9 Q My understanding is that is at least initially  
10 where it was kept.

11 A Yep.

12 Q Did you, through your personal computer, have  
13 access to the security tracking system?

14 A No, you could not get--when I finally got a  
15 computer it was a network computer and you could not access  
16 that data base from the network computer.

17 Q Okay. So, you had to personally access the Wang?

18 A Wait a minute. Yes, we did have that, I'm sorry.  
19 I forgot. But, yes, we did have that on the network but we  
20 had to have a code to get that.

21 Q Okay. Do you know whether Mr. Marceca had access  
22 to the security tracking system?

23 A He was not on the network.

24 Q So, therefore, he would not have had access?

25 A Nmm-nmm.

1 Q Can you describe to us your responsibilities in  
2 the Office of Personnel Security?

3 A Basically to see the day-to-day functions, oversee  
4 that. To help funnel the massive amounts of paperwork  
5 through. To, geez, that pretty much about covers  
6 everything.

7 Q Were you basically Mr. Livingstone's--

8 A Assistant.

9 Q --direct assistant?

10 A Yes.

11 Q And that would have been the case from when you  
12 started until when you completed your tenure?

13 A Hmm-hmm.

14 Q Did your responsibilities ever change during the  
15 course of your tenure at the Office of Personnel Security in  
16 a significant way?

17 A No.

18 Q Okay. I assume you, did you report to Mr.  
19 Livingstone?

20 A Everybody reported to Craig.

21 Q Did anybody report to you?

22 A They were responsible to keep me updated.

23 Q When you say, they, can you tell me who you are  
24 referring to?

25 A Lisa Wetzel, Ed Hughes, Tony Marceça, and the

1 interns, whichever interns happened to be in the office at  
2 that time.

3 Q Okay, I'm sorry, I interrupted. You said they  
4 were responsible to?

5 A Keep me updated and, as far as, the interns, I was  
6 to direct them as to what their duties were going to be.

7 Q Okay. With respect to Lisa, Ed and Tony, did you  
8 direct them as to what their activities were to be?

9 A I would advise them as to what Craig said their--  
10 what their projects were to be.

11 Q Okay. So, would it be accurate to say that Mr.  
12 Livingstone would tell you what their activities were to be  
13 and you would kind of oversee them?

14 A No.

15 Q Okay. Correct me how I mis-stated it.

16 A It would be appropriate for Craig to tell me these  
17 are the projects that he wanted Lisa to work on, that he  
18 wanted Ed to work on, that he wanted the interns to work on,  
19 and then my responsibility would be to say, this is where  
20 they are in those projects.

21 Q It would be your responsibility to update Mr.  
22 Livingstone--

23 A Hmm-hmm.

24 Q --as to where they were?

25 A Yes.

1 Q But you would say it was not your responsibility  
2 to oversee their completion or activities in completing  
3 those products, projects?

4 A Yes, and no. It was my responsibility to see what  
5 their progress was and then to report that back to Craig and  
6 if that was not satisfactory then it was my responsibility  
7 to go back and say you need to move it on.

8 Q Okay.

9 A You need to get cracking.

10 Q Did you provide written memorandum to Craig  
11 Livingstone?

12 A Not when he was just across the office, no.

13 Q Okay. When you first, in the early months at the  
14 Office of Personnel Security I understand Ms. Nancy Gemmell  
15 remained as an employee?

16 A Hmm-hmm.

17 Q Did you spend a significant amount of time with  
18 Ms. Gemmell discussing the office?

19 A Periods. There was a lot of intricacies that you  
20 had to learn that when you first come in you are inundated  
21 with you need to learn how you get a name check, how you do  
22 this, how you do that, that I was still groping with. And  
23 then so, I wasn't spending directly, like hours and hours  
24 and hours with Nancy. Towards the end--

25 Q The end of her--

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1 A Of her tenure, I started spending more time with  
2 her but it really wasn't enough to cover everything.

3 Q Okay. Can you give us some sense, in however it  
4 is easiest for you to guesstimate, how much time you would  
5 spend with Ms. Gemmell during these periods? Would it be  
6 something around an hour a day or, you know, a day a week?  
7 How could you--

8 MR. SCHANZER: You all worked in the same office.

9 THE WITNESS: We worked in the same office. I  
10 mean we were there, we were together eight hours a day when  
11 we were both present in the office. As to when, I mean I'm  
12 sorry, I don't mean to laugh, I'm just--

13 BY MR. HIRSHLAND:

14 Q Well, maybe you're misunderstanding the question.

15 A I think I am.

16 Q I understand that everyone was in the office at  
17 the same time and, therefore, you were both working together  
18 in a physical geographic sense. What I mean to ask is the  
19 time that you spent--you, yourself, said that you spent more  
20 time with her later on and less time with her early on. By  
21 that I'm assuming you didn't mean that she was in the office  
22 less, you meant that you were actually interacting with her  
23 and having discussions about how the office worked.

24 A Well, actually she was in the office less because  
25 she was taking care of what projects she had going on. And