

1 all of those projects she spent a great deal of time getting
2 a set-up files together, which included trying to put
3 everything that she did in files. I mean just so that, if,
4 because she knew we wouldn't be able to cover everything and
5 we didn't cover everything.

6 Q Right.

7 A Pardon me. Towards the end--

8 Q For the record, I understand that she left in
9 August of '93, so, you meant towards August of '93.

10 A In August of '93.

11 Q Okay.

12 A I would say, I really can't remember, but I would
13 guess probably two hours a day because the workload was so
14 heavy that I think two hours was probably, I would guess, as
15 much as we could allow just to specifically spend on what
16 she was doing.

17 Q So, two hours a day you would be discussing with
18 her what she was doing, what needed to be done, that sort of
19 thing?

20 A Hmm-hmm.

21 Q And this is in August?

22 A This was in August.

23 Q Prior--

24 A Primarily the last two weeks that she was there.

25 Q Prior to that, do you recall spending any time

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1 with her talking about these things?

2 A Throughout the whole course any time I had a
3 question I would go and ask Nancy or if she had something
4 that would come up in the course, she would be like this is
5 what you need to do. But I mean it wasn't specifically,
6 okay, for an hour today we're going to do this.

7 Q Okay.

8 Do you recall who had combination to the vault in
9 your office?

10 A The staff members. Anyone who was on staff, not
11 interns, but on staff had that combination.

12 Q So, that would include Mr. Livingstone?

13 A Yes.

14 Q Yourself, Ms. Wetzell, Ed Hughes, Mr. Marceca?

15 A And Nancy Gemmell.

16 Q And Nancy Gemmell. Do you know whether anyone in
17 the White House Counsel's Office had the combination to the
18 vault?

19 A I have no knowledge of that.

20 Q Okay. Do you recall who was permitted to actually
21 check files out of the Office of Personnel Security?

22 A The people who had the authority to check, come in
23 and check files out would be primarily George Saunders, Bill
24 Kennedy, a counsel member under the direction of Bill
25 Kennedy if they, or like, Lloyd Cutler also could, of

1 course. And of those, Lloyd Cutler or his assistants would
2 have that authority.

3 But also, like, sometimes I think later Clarissa
4 Cerda had that ability. When Chris Cerf came on, with OA,
5 he had that ability because he, I can't remember exactly
6 what his function was, but it was an overlapping between
7 something and I can't remember what it was.

8 Q Were you told at particular points in time, who
9 was permitted to check files out so that you would know if
10 someone came to you?

11 A I'm sure at some time I was. Exactly when, I
12 don't know.

13 Q And would it have been Mr. Livingstone that would
14 tell you this or somebody else?

15 A I can't remember.

16 Q Okay.

17 A I'm assuming.

18 Q Do you ever recall an individual asking to
19 retrieve a file from the Office of Personnel Security who
20 was not authorized to do so?

21 A Several staff members would like copies of theirs
22 and we said, no.

23 Q Okay.

24 A They would like copies of their own backgrounds
25 and we said, no.

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1 Q Do you recall particular individuals who asked to
2 see?

3 A No.

4 Q Okay. Other than individuals asking for their own
5 files, do you recall any individuals who were not authorized
6 to receive the files, asking to see files?

7 A No.

8 Q It is our understanding that in July of 1993, a
9 log was established in order to record when a file was
10 checked out from the Office of Personnel Security and who
11 checked the log out.

12 A I'm sorry, what do you mean by who checked the log
13 out? Nobody checked the log out, the log was maintained in
14 the office.

15 Q I'm sorry, I mis-spoke. I said, who checked the
16 file out.

17 A Oh.

18 Q Do you recall prior to July of 1993, first,
19 whether any files were ever taken out of the Office of
20 Personnel Security?

21 A I don't have a specific knowledge of files being
22 taken out prior to '93.

23 Q Prior to July of '93.

24 A Prior to July of '93.

25 I don't remember that.

1 Q Okay. Do you recall whether there was any system
2 ever in place, prior to July of '93, to record when files
3 were checked out of the office?

4 A The previous administration and what had carried
5 over to our administration was to slip a card into that file
6 saying this BI has been checked out.

7 Q Would this be a pink slip? I've heard reference
8 to a pink card.

9 A Yes. If I remember correctly, I think it was a
10 pink card.

11 Q Hmm-hmm.

12 A I think it was.

13 Q Okay. If you don't remember precisely, that's
14 fine, you know.

15 A There are so many colors.

16 Q If ever there was an office that had a lot of
17 paperwork, yours was one, I understand.

18 A We did our share.

19 Q And is it your recollection, therefore, that that
20 system was in place between February of '93 and July of '93?

21 A If the files had been checked out, that would have
22 been the method that would have been used, but I don't
23 remember files being checked out.

24 MR. SCHANZER: Can I ask a question here?

25 I mean what files would there actually have been

1 in February? I mean you didn't have the hold-overs yet, new
2 employees didn't have much.

3 THE WITNESS: There were none. That's why I don't
4 think--that's why I have no--I don't think I have any
5 recollection of it.

6 BY MR. HIRSHLAND:

7 Q Well, to clarify, I presume that there were
8 actually files set up but that various information that
9 ultimately had to go into those files would not yet have
10 been in the files?

11 A The log that you're referring to is logs of
12 background investigations which would have been checked out.

13 Q The July log, correct?

14 A There were really no background investigations
15 back in the office at that time.

16 Q I see.

17 A Because we were still trying to get SF-86 forms on
18 everybody, we were still trying to--I mean when we first
19 came in we were processing a huge number of people just to
20 get them in the White House so that they could be in the
21 White House and so that they could have a temporary pass
22 just so we could establish staff members who could come in
23 without having to go through the WAVE system which couldn't
24 have accommodated every single person to come into the
25 system.