

1 otherwise occupied, also Lisa could have, also Craig could  
2 have, anyone in the office could have.

3 Q Was it, well, start with you, was it your  
4 understanding that whenever a file was to be taken out of  
5 the office someone--

6 MR. SRERE: Let me clarify.

7 MR. HIRSHLAND: Sure.

8 MR. SRERE: You're talking about files and my  
9 understanding of the testimony so far, these are not files  
10 that are being checked out, these are background  
11 investigations that are being checked out and they are not a  
12 complete file. And I believe that's what Ms. Anderson has  
13 testified. So--

14 MR. HIRSHLAND: That could be a very helpful  
15 clarification.

16 Take the first entry--by the way, we are following  
17 the practice of not mentioning any individuals' names in the  
18 left-hand column which is for privacy reasons.

19 BY MR. HIRSHLAND:

20 Q So, take the first entry here as an example, July  
21 19th. When it says, that that particular file was checked  
22 out, what is meant is that just a background investigation  
23 was taken out?

24 A No. If you read this whole first line it says  
25 that it was the SF-86 form that was checked out.

1 Q Okay. How about the other entries? Go to the  
2 second one, it just says--

3 A That would have been the return background  
4 investigation and then if you go down a little bit further  
5 you can see that--

6 MR. SRERE: I'll point to it. 9/21/93.

7 THE WITNESS: 9/21. You can see that there were  
8 two BIs that were checked out because she had a partial and  
9 then a follow-up that completed it. The FBI practice was  
10 they had a certain time frame that they had to return  
11 something back. And if the background had not been fully  
12 completed, a partial would be returned and a follow-up would  
13 be forthcoming.

14 BY MR. HIRSHLAND:

15 Q Okay. I see further down there's three entries  
16 there dated on October 12th, and it appears on the column,  
17 it says, it's hard to read but it appears to say memos only.  
18 Do you know what that reference is to?

19 MR. SRERE: It's hard for--I am just stating, I'm  
20 not sure that says memos only.

21 MR. HIRSHLAND: Okay.

22 MR. SRERE: But if Ms. Anderson recalls or can--

23 MR. HIRSHLAND: If you don't, that's entirely  
24 fine. It's not a critical piece.

25 THE WITNESS: I do not know.

1 013124

1 MR. HIRSHLAND: Okay.

2 BY MR. HIRSHLAND:

3 Q So, unless otherwise noted, if the only  
4 information in the log is an individual's name and then the  
5 name of whoever checked it out, and George Saunders most  
6 often, and then a date and then returned and then perhaps a  
7 date and some initials.

8 If that's the only information there and there's  
9 no other information that, therefore, represents that a BI,  
10 a background investigation was checked out of the Office of  
11 Personnel Security?

12 A Hmm-hmm.

13 Q And no other information from--

14 A No other information.

15 Q --a personnel file.

16 That's a helpful clarification, thank you.

17 Having made that clarification, was it your  
18 understanding that whenever a BI was removed from the Office  
19 of Personnel Security that a notation must be made in this  
20 log?

21 A Hmm-hmm.

22 Q Did you understand that the other individuals in  
23 the office, Craig Livingstone, Tony Marceca, Lisa Wetzl, Ed  
24 Hughes, shared that same understanding?

25 A Yes. But there's one thing that you need to know.

1 At the beginning of this, I am not sure Tony was even in the  
2 office. He was only detailed to our office for six months.

3 Q Okay. Do you recall whether he ever actually made  
4 entries in this log?

5 A I don't think so, but I don't remember  
6 specifically.

7 Q Okay. Well, why don't we then set Mr. Marceca  
8 aside for a second and say the other individuals in the  
9 office, who were staff members.

10 A That was the understanding.

11 Q Okay.

12 A Anyone who currently, at that time, was a staff  
13 member.

14 Q Okay. I see that--

15 MR. SCHANZER: Before you go to the next page I  
16 have a question.

17 MR. HIRSHLAND: Sure.

18 MR. SCHANZER: Are all these entries on here your  
19 handwriting?

20 THE WITNESS: No.

21 MR. HIRSHLAND: We're referring to page one at  
22 this point.

23 MR. SCHANZER: Okay. Could you indicate what's  
24 not your handwriting?

25 THE WITNESS: All of this up to right here.

1 MR. SRERE: Approximately 10/12/93.

2 THE WITNESS: 10/12.

3 MR. HIRSHLAND: Okay, that's the second entry  
4 dated 10/12, is that correct?

5 THE WITNESS: The second entry, maybe the first,  
6 but I'm not 100 percent sure. I dont think that's mine.  
7 So, the 10/12 entries down to I think, the second to the last  
8 one looks like mine. And, so, the last two entries.

9 MR. SRERE: That block of people are not your  
10 handwriting, is that correct?

11 THE WITNESS: That block is not mine.

12 MR. SCHANZER: The 10/12 block?

13 MR. SRERE: Right.

14 THE WITNESS: The 10/12 block down to the second  
15 to the last.

16 MR. SCHANZER: And the last two are your  
17 handwriting?

18 THE WITNESS: The bottom one definitely and the  
19 second one looks to be.

20 BY MR. HIRSHLAND:

21 Q Do you have any recollection who the others, who  
22 might have checked out the others?

23 A No.

24 MR. SRERE: The question was broad. Look at the  
25 return column, are all those your handwriting on the return

1 column?

2 THE WITNESS: No.

3 MR. SRERE: I take it the block from approximately  
4 9/8 through 10/12--

5 THE WITNESS: Up to the block of date returned up  
6 to 8/25 would have been mine.

7 MR. SCHANZER: Do you know whose handwriting is  
8 subsequent to that?

9 THE WITNESS: No.

10 MR. SRERE: And I just want to point out for the  
11 record, we haven't done a detailed, we are sitting here  
12 giving you a general idea of some people. Some handwriting  
13 on here was not Ms. Anderson's. But for instance, you just  
14 said a block up to 8/25, but I'm pretty sure the block of  
15 8/20/93 is not her's, in the return column.

16 THE WITNESS: Oh.

17 MR. SRERE: So, I mean I just want to make sure  
18 the record's straight so she's not saying that everything  
19 else on the page is her handwriting and just to give you a  
20 general idea it's not all her handwriting.

21 MR. HIRSHLAND: That's helpful.

22 THE WITNESS: I'm interspersed.

23 MR. HIRSHLAND: David, do you have any other  
24 questions about this page?

25 MR. SCHANZER: No.