

1 have remained at the office?

2 A They would have remained in the office.

3 Q Okay. Do you remember--can you provide us any  
4 detail of where you kept the notes? Was it in a binder?  
5 Was it in a particular file?

6 A It was in a notebook that was on my desk.

7 Q Do you know what color the notebook was?

8 A If you go down to the basement and look in the  
9 office of Administration Supply, I'm sure they've got a  
10 hundred that are just like them, but that was 3 years ago.  
11 I--other than a spiral notebook--I think it was beige, but  
12 other than that--

13 Q That's fine.

14 I understand from Ms. Gemmell that at various  
15 points in time, she would have discussed with you what she  
16 and others have referred to as Project Update.

17 A Uh-huh.

18 Q Can you walk us through Project Update as it was  
19 explained to you and as you were involved in it and from A  
20 to Z?

21 A I cannot recall it specifically, but to the best  
22 of my recollection, what occurred was we requested a current  
23 permanent pass list from the uniform Secret Service division  
24 that was down in the basement of the White House.

25 Q When you say we requested--

1 detail would that have been? Can you--

2 A I can only estimate, and I don't--

3 Q Would you do so?

4 A I would say probably about June--

5 Q Okay.

6 A --he started exchanging letters with the  
7 Department of Defense.

8 Q And do you recall him discussing with you that  
9 he--that there was this matter of Project Update and that he  
10 was planning on having Tony perform it?

11 A Yes.

12 Q Okay. Do you recall Ms. Gemmell having any  
13 conversations with you about Project Update?

14 A As I stated before, she gave me a brief overview  
15 stating that a list from WAVES that was only permanent  
16 passholders is what we based what our request would be off  
17 of, and from the permanent passholders list that we had  
18 received from WAVES, because that was the best way we could  
19 determine to find out who was a holdover because everything  
20 had been archived--everything created or generated during a  
21 Presidential administration is a Presidential record. So  
22 all of those previous files, we had no idea who they were.  
23 So based on the permanent pass list, we found out who--or we  
24 assumed we found out who we needed to request the previous  
25 background investigations on, and based on that list, there

1 Nancy Gemmell did request a few lists, and she had started  
2 the update project, and the way that it worked, I believe we  
3 did request a fresher list because of the turnover.

4 BY MR. HIRSHLAND:

5 Q Do you recall Ms. Gemmell ever indicating to you  
6 that you should--you meaning your office after she  
7 left--should proceed with Project Update in an  
8 office-by-office fashion? Did it take one set of employees  
9 from one office and save for later on in the project what  
10 she considered high-turnover offices, such as the White  
11 House staff or National Security Council?

12 A As far as the update project went, I got a very  
13 brief summary because from the moment the whole update  
14 project came about, it was always intended that Tony was  
15 going to be the one to handle that project. So I got a very  
16 brief explanation.

17 Nancy, I believe, explained it completely to Tony  
18 as to, okay, this is what you do, step by step by step.

19 Q When you say it was understood, that would be  
20 primarily Tony. Do you recall who communicated this to you?

21 A Craig.

22 Q Do you recall when?

23 A During the time that Craig was fighting to get  
24 Tony assigned over to us as a detail.

25 Q How far in advance of him actually beginning his

1 yes, he is here, because there was someone who had that  
2 information.

3 Q And at what point in the whole process would you  
4 have gone to these four individuals to have them do that?

5 A During the whole process.

6 Q In other words, at some point, you had a list, and  
7 you ordered--you or someone from your office would have  
8 ordered BI's for the individuals on that list?

9 A Uh-huh.

10 Q Do you recall whether someone would have confirmed  
11 with these four individuals the accuracy of that list before  
12 they ordered a BI or after?

13 A Tony Marceca.

14 Q I'm sorry. Let me make my question clearer. Do  
15 you recall whether that confirmation would have been before  
16 a BI was requested from the FBI--

17 A Yes.

18 Q --or after?

19 A It would have been before. What he would do is  
20 type out a memo saying this is the list of people that we  
21 have who are--who have current permanent passes, who--I  
22 mean, I don't know the exact wording, but paraphrasing, it  
23 would say who on this list should not be on this list, so  
24 that we can request previous backgrounds, and he would send  
25 it to Nancy. He would send it to Al Nagy. He would send it

1 were only four offices that I can think of off the top of my  
2 head that we could have done it office by office before we  
3 hit the big high-turnover offices, and that would have been  
4 the Office of the Vice President, which JoAnne Hilton would  
5 have been the contact because she herself was a holdover,  
6 the National Security Council, which would have been Pat  
7 Nelson because she was the holdover, Nancy--and I can't  
8 remember her name--who was in charge of the crew that worked  
9 in the White House itself because she was--

10 MR. SCHANZER: In the residence?

11 THE WITNESS: In the residence, yeah. And I can't  
12 remember Nancy's last name. And then Al Nagy who did the  
13 AT&T and the C&P employees.

14 BY MR. HIRSHLAND:

15 Q Now, the four offices you just described as ones  
16 that you're suggesting were not high turnover?

17 A No. I'm suggesting--I'm saying that those are the  
18 offices where there was someone who was a holdover, who we  
19 could go to and say this is the list that we have of current  
20 people that the Secret Service has who are currently working  
21 for you, can you tell me if they are here, if they are not  
22 here, and they would go down that list and say--like, for  
23 instance, Pat Nelson would go down the list and say yes, he  
24 is here, yes, he is here, yes, he is here, no, his detail  
25 has ended, so we don't need to request his, yes, he is here,

1 typewriter.

2 Q Okay.

3 MR. HIRSHLAND: Let's go off the record for a  
4 moment?

5 [Off the record.]

6 MR. HIRSHLAND: Back on the record.

7 BY MR. HIRSHLAND:

8 Q You were describing that you believe that that was  
9 probably Ms. Gemmell's memo, a memo that she initially typed  
10 up.

11 A Yes.

12 Q And Mr. Schanzer asked you why you thought so?

13 A In the manner that it's prepared, it looks like it  
14 was typed to me.

15 MR. HIRSHLAND: David, do you want to follow-up at  
16 all?

17 MR. SCHANZER: Sure.

18 [Anderson Deposition Exhibit  
19 No. 2 was marked for  
20 identification.]

21 MR. SCHANZER: Let me hand you another document.  
22 Does this look like a memo that Mr. Marceca would have typed  
23 up?

24 THE WITNESS: Yes.

25 MR. SRERE: Let's identify the document for the