

1 MR. SCHANZER: Okay. It's just that our records  
2 show that requests were being made all through this period  
3 to the FBI, so, I'm just trying to figure out.

4 THE WITNESS: To the best of my knowledge, Tony  
5 was going through and striking the names or he had gone  
6 through and struck the names that should not have been on  
7 that list.

8 MR. SRERE: To the extent you could recognize  
9 them.

10 THE WITNESS: Yes, to the extent that we could  
11 recognize them.

12 MR. SRERE: It's one thing a Bush or a Quayle and  
13 another thing to strike Mr. [name deleted].

14 BY MR. HIRSHLAND:

15 Q When did you first learn that the Office of  
16 Personnel Security had received BI's of prior administration  
17 officials who, in fact, no longer had access to the White  
18 House or had a need for a pass?

19 A Specifically? Specifically, I don't remember when  
20 I first learned it.

21 Q Okay.

A I do know that after everybody was aware of it  
that we did say, well, what are we going to do.

22 Q Everyone was aware of the list being complete or  
23 the FBI files actually coming into the office?  
24

1 A Of the files coming into the office of people who  
2 had not been there.

3 Q Of people who no longer had access--

4 A Who were no longer working there.

5 Q So, therefore, there was no need for the files; is  
6 that correct?

7 A No.

8 Q Okay.

9 A According to what we were working off of, they all  
10 had access. They all were active because the important  
11 thing to note is that on this list that we received from the  
12 Secret Service, it listed all active permanent passes, which  
13 means that in the computer, as far as the Secret Service was  
14 concerned, these were people who had access.

15 Q Okay. I'm just trying to clarify. Did the report  
16 actually indicate whether an entry was for an active or  
17 inactive individual?

18 A Active. That's what we requested was all active  
19 permanent passholders.

20 MR. SCHANZER: Is there anything on the list that  
21 indicated whether--

22 THE WITNESS: Yes. There was a section that said  
23 active. There was, like, a column. You had the name. Oh,  
24 God, you can configure it to get anything you wanted, but it  
25 had, like, the name, and I think at the top--I can't

1 remember if there was--if on the list that we used if there  
2 was a column that said active or if on the top it said  
3 active permanent passholders or active E passholders.

4 BY MR. HIRSHLAND:

5 Q But your recollection is that somewhere on the  
6 actual list--

7 A It said active.

8 Q Okay. Well, at some point, did you or someone  
9 else in the office recognize that an FBI file had been sent  
10 to the Office of Personnel Security for someone who, though  
11 they may have been on that list, in fact, was not active?

12 A Yes.

13 Q Do you recall when--who recognized that and when?

14 A No, because it was like in the day-to-day course  
15 of things. I do recall that when we found out about it, we  
16 said, well, how can we rectify this problem, and a lot of  
17 the previous backgrounds that we were requesting were for  
18 White House operations, which if you look on the list, it  
19 will break it down by, like, National Security Council,  
20 Office of Vice President, C&P, or, you know, whatever office  
21 they were working in.

22 White House Operations covered everybody,  
23 everything that was not specific towards the Office of Vice  
24 President, and there was no way we had of knowing whether  
25 this person was in the Office of Presidential Personnel,

1 whether this person was in Correspondence, whether this  
2 person was in Council's Office, whether this person was in  
3 Domestic Policy, Cabinet Affairs, where this person was, and  
4 when we get the backgrounds back, it says, Suzie Que in the  
5 Office of Presidential Personnel. So it's at that point  
6 that we would have, okay, we can now go to the Office of  
7 Presidential Personnel and say where is Suzie Que, is she  
8 still here.

9           And when we were working off of that list, we came  
10 to the realization that anybody that was listed as White  
11 House Operations, there was no way we were going to be able  
12 to know where in the White House they worked. It was  
13 literally impossible based on the list that we had to know,  
14 because it still said active, where they were, and so--

15           Q     Do you remember this was first--was it while Tony  
16 was still there?

17           A     It was while Tony was still there.

18           Q     Okay.

19           A     And what we decided was since Tony was going  
20 through it at a moderate pace--I mean, he wasn't barreling  
21 through it. He was going pretty slow--that he was doing the  
22 offices that he could say, okay, is this person still  
23 here and whatnot, but, like, the White House Operations, he  
24 was going through and saying we're going to request these  
25 because we have no idea where they are. There was no way

1 that we could come up with, that we could figure out, how  
2 can we find out who these people are, because we were also  
3 looking for ways to save ourselves some work.

4 Q Right.

5 A So, basically, what ended up happening was with  
6 White House Operations, those listed under White House  
7 Operations, the best way we could figure out who they were  
8 and where they were and if they were still there was to  
9 request the background. There was no other way. Nobody  
10 else had records. It was all archived.

11 Q I see. Do you recall--

12 MR. SCHANZER: Who is we?

13 THE WITNESS: The Office of Personnel.

14 MR. SCHANZER: Who were you working with at this  
point when you said when we figured this out? Did you have  
discussions with Mr.--

THE WITNESS: Craig. Craig, Tony, Lisa. We all  
sat down and tried to figure it out.

19 BY MR. HIRSHLAND:

20 Q Do you know if Bill Kennedy at any point was  
21 apprised of the situation or asked for advice?

22 A I don't know specifically.

23 Q So what was the plan for--once the--you had  
24 this--what you understood to be over-inclusive list of White  
25 House Operations.

1 A Uh-huh.

2 Q You said you all sat down and figured you had to  
3 order the BI's first. What was kind of step two once the  
4 BI's came back? What was the plan of attack then?

5 A Once we found out that Suzie Que was working in  
6 the Office of Presidential Personnel, Tony would then call  
7 Office of Presidential Personnel and try and track down  
8 Suzie Que.

9 He would call whoever the staff contact, staff  
10 director, whoever that person was, and say where is Suzie  
11 Que in your office. We don't know. You might want to try  
12 here. And so he would sort of be following a trail to find  
13 out who they were. If he could not find them, then the file  
14 was slated to be archived, since they didn't work there.

15 Q Do you know--when they were slated to be archived,  
16 were they put on a separate shelf in the vault, for example?

17 A Yes. They were put on the other side of the vault  
18 in one of the bins on that other side.

19 Q Do you know while you were there, were they  
20 referred to as Tony's files?

21 MR. SCHANZER: Or the dead files?

22 THE WITNESS: That sounds familiar, but to be  
23 honest, I don't remember.

24 MR. SCHANZER: Do you do this process for, let's  
25 say, NSC people as well?