

1 was capable of providing us with a list of active or
2 inactive, but not that they could go back 10 years and
3 provide a list like this.

4 MR. SCHANZER: Okay; when we stopped our
5 chronology, you had had a discussion with Nancy Gemmell in,
6 I believe, it was August, 1993.

7 THE WITNESS: Mm-hmm.

8 MR. SCHANZER: What happened next to Project
9 Update?

10 THE WITNESS: Tony came in. I think it was a bit
11 prior before he was actually supposed to be there. I think
12 he came in for 2 days prior to when he was actually supposed
13 to show up for a week--I don't remember the exact time--so
14 Nancy could run through exactly how this project would work
15 and exactly how he needed to go about doing it. He came in;
16 he spent that time with Nancy going over the list he was
17 going to use, how he was going to go about it and what the
18 process was to be to do the update. And then, Nancy left;
19 Tony showed up and began the project.

20 BY MR. HIRSHLAND:

21 Q Did you actually overhear that discussion? Were
22 you present when Ms. Gemmell and Mr. Marceca--

23 A It was like an all-day thing, and they were in the
24 vault primarily, and, I mean, I would have been in and out
25 of the office--

1 Q Right.

2 A --and doing other things. I don't specifically,
3 remember sitting there watching them and listening to them,
4 but I visually saw them going over it.

5 MR. SCHANZER: When Tony began the project, did he
6 use the same list that Nancy Gemmell had been using?

7 THE WITNESS: Initially, he did. And if I
8 remember correctly, he pointed out that the list was a few
9 months old or was a bit old and that maybe we should get a
10 new one.

11 MR. SCHANZER: Okay; now, obviously, you remember
12 seeing the original list, the one Nancy Gemmell used.

13 THE WITNESS: I remember seeing many different
14 lists--

15 MR. SCHANZER: Right.

16 THE WITNESS: --that she used.

17 MR. SCHANZER: Do you know what it was dated?

18 THE WITNESS: No, I do not remember that at all.

19 MR. SCHANZER: So, what happened after Tony--

20 THE WITNESS: Brought up the fact that it was an
21 older list?

22 MR. SCHANZER: Yes.

23 THE WITNESS: We requested, meaning the White
24 House Personnel Security Office requested, a newer list. We
25 received that list.

1 MR. SCHANZER: When you made that request, did you
2 have to make a specific request for a list that had place
3 and date of birth on it?

4 THE WITNESS: I believe we probably did; I don't
5 remember specifically what we requested. I remember--the
6 only thing I specifically remember that we did request was
7 permanent pass active, and I don't remember what other
8 things we included specifically. But we would--to have done
9 the project, we would have had to request that information.

10 MR. SCHANZER: Did you limit your request to
11 specific offices? So, in other words, did you exclude
12 offices that had already been done by Nancy Gemmell and Tony
13 up to that point?

14 THE WITNESS: No, because I think we just wanted
15 to get a current list, and I don't remember if those offices
16 had been--if all the offices had been completed or not. I
17 don't know if--like, I noticed on the document, on one of
18 the exhibits you handed me that one of the names was William
19 Cobbs, who did the GSA, and I don't know if the GSA office
20 had been done by the time Nancy left. I don't think, if I
21 remember correctly, that the telephone offices--C&P and
22 AT&T--had been done by the time Nancy left. I don't know
23 which ones she had finished. I don't think she did, so I
24 don't think we had a reason to say, oh, we don't need these.

25 MR. SCHANZER: And to the best of your

1 recollection, this request for the second list took place
2 when?

3 THE WITNESS: Sometime in September.

4 MR. SCHANZER: And you went to pick up the list--

5 THE WITNESS: Mm-hmm.

6 MR. SCHANZER: --from the Secret Service?

7 Who at the Secret Service would the request have
8 gone to?

9 THE WITNESS: That would have been either J.C.
10 Pearce--it's either Pearce or Pearson--or Sergeant--I
11 believe his first name was Morris Kraft.

12 MR. SCHANZER: Now, did anyone at the Office of
13 Personnel Security have anything to do with actually getting
14 on the Secret Service system and producing the list that was
15 used for Project Update?

16 THE WITNESS: No, we had no access to their
17 computers whatsoever.

18 MR. SCHANZER: So, explain the process that t
19 place when you went to get the list. Where did you go? Who
20 did you talk to? What happened?

21 THE WITNESS: The way that the EOB is configured
22 is that there is a basement, a ground floor, a first floor,
23 a second floor, third floor. We were on the ground floor,
24 and we would go down into the basement, and there is an
25 office down there that contained--like, it was basically the

1 WAVES center. We would go down to the WAVES center. If we
2 needed to add somebody--or, one of the things we would do is
3 do a quick--like when somebody came in, a new person came
4 in, the very first thing we would do is run--have them do a
5 quick, like, has this person done anything wrong.

6 MR. SCHANZER: NCIC?

7 THE WITNESS: I think it was the NCIC.

8 MR. SCHANZER: Name check?

9 THE WITNESS: It wasn't the FBI name check, but it
10 was something just going into the computers real quick to
11 find out if this person was violent or not. And we did that
12 daily. And I went down to turn in the name--or to turn in
13 this list. It's that same place that I would turn in the
14 memo to get that list. And you--I went down, and normally,
15 any time we requested a list, what we would do is just hand
16 it over to J.C. or Sergeant Kraft, and then, they would say,
17 oh, I'll have it for you X or I'll have it for you X.

18 MR. SCHANZER: And it meaning the request for the
19 list.

20 THE WITNESS: The request for the list. And
21 generally, when we requested a list, I don't remember if he
22 called me, and I went down, or if he said it will be ready
23 by this time, and I went down. But generally, any time we
24 requested a list, they said it would be ready at X time, or
25 they would call up and say I have the list down if the

1 computer had busted down, which it did sometimes.

2 MR. SCHANZER: Do you know what division or office
3 within the Secret Service this would have been?

4 THE WITNESS: This would have been, if I remember
5 correctly, the United States Secret Service Uniformed
6 Division TSD.

7 MR. SCHANZER: Their Technical Services Division?

8 THE WITNESS: Yes, I couldn't remember that first
9 one.

10 MR. SCHANZER: And what happened next?

11 THE WITNESS: We brought the list up. As I was
12 coming up the stairs, I quickly glanced over it, and I
13 noticed the names of Bush, Quayle, James Baker, Marlin
14 Fitzwater.

15 MR. SCHANZER: Did the list say WAVES or E-pass,
16 or did it have any other type of identifier on the top?

17 THE WITNESS: I cannot remember exactly what it
18 said.

19 MR. SCHANZER: Did it have the green and white 17-
20 inch paper?

21 THE WITNESS: Yes, it was all on the green and
22 white 17-inch.

23 MR. SCHANZER: Would it have been in the same type
24 of print as Exhibit 5 would have been?

25 THE WITNESS: Yes, every list that we received