

mentioned it to him, although I previously have testified over at the Senate, and as I said at the Senate, I am not sure how I would have known about that job. So --

Q Did you have more than one conversation with Mr. Livingstone about jobs in the White House or obtaining a job in the White House?

A I don't know. I mean, I talked to him several times when we were working on this project, so I don't know. I don't remember.

Q Do you recall whether Mr. Livingstone told you that he had wanted the job as the Director of the Office of Personnel Security?

A You know, I really don't -- I had my own office that I was trying to set up and hire people and, you know, fight to get more resources for my office, and I was very focused on my office. I know I talked to Craig. I know I talked to a number of people.

I just -- I can't recall whether he specifically knew about this job and he wanted this job and we only talked about it once or whether he was looking at a number of jobs and asked me about this one. I mean, I know I talked to him about working in the White House, but I can't recall with any specificity whether he initiated the conversation or I did, whether he knew about the job or I did, whether it was one job or a bunch of jobs. I just don't know.

Q Okay. Do you recall whether you recommended him to anyone for that position?

A I do recall that Vince Foster talked to me about Craig for a job in the Counsel's Office. As I recall the job described to me, it was nowhere near what it has subsequently been reported to be. As I recall the job, it was an administrative paper-pushing kind of job, someone who knew most of the new Clinton employees, to sit on them to make sure they got their paperwork done. The paperwork would then go to all the places it needed to go, including the FBI.

And my impression or my conclusion or assumption was, you know, the FBI did the paperwork, talked to the Secret Service, gave the Secret Service the clearance or denial to

go ahead and issue the pass. If there was a problem, it would go to the Counsel's Office.

When Vince talked to me about that job and asked me whether or not Craig could do that job, I most likely would have said, sure. It was presented as a very, you know, can he get the -- can he sit on top of people until they get their paperwork done?

Would he be intimidated by people who were White House higher-ups? Would he be afraid to go to them and say, you have to do your paperwork?

And I said, no, I think he would be fine to get them to get their paperwork done.

Q I am going to ask you to make a distinction again. Do you recall if Mr. Foster already had Craig Livingstone's name or if --

A I really don't. I don't know. Again, it seems unlikely that I would have gone to Vince and said, here you have got this job, I have got this person, because I don't really know how I would have known about the job.

I was trying to set up my own office, and I had a number of people that wanted me to help them get jobs, particularly the people that worked directly for me on the campaign and the inaugural. So it would be unlikely that I would have gone to Vince and said, I have this person for this job.

Q Do you know whether you discussed the possibility of hiring Craig Livingstone for any position in the White House with anyone else?

A Not that I recall, although I could -- somebody else who may have been thinking about hiring him could have checked his reference with me, but I don't recall it.

Q Do you recall discussing the possibility of hiring Craig Livingstone for this Director of Personnel Security position with anyone else besides Vince Foster?

A Yes. Subsequently Bill Kennedy discussed it with me.

Q Do you recall any of that conversation?

A Yeah. As I recall it, it was a very brief conversation where my recollection is or my sense is that Craig was being put in the position permanently and Bill was verifying that I had, indeed, given Vince a recommendation.

Q Did he ask you any questions about Mr. Livingstone?

A Not that I recall.

Q I am just going to show you this document, CGE 046218 and 219. Have you ever seen a document like that before, not necessarily with this -- Mr. Livingstone's name on it or Mr. Segal's name on it?

A I don't believe I have ever seen one of those. No, not that I am aware of.

Q So you wouldn't know if this is how they moved resumes around?

A No.

Q Did you ever receive resumes from a resume bank in filling positions on your staff?

A Not that I recall.

Q Okay.

A Do you want me to look at the second page?

Q Sure.

A No. Huh-uh.

Ms. Remington. And I am also -- let me just make this Deposition Exhibit 1. That was CGE 046218 and 219.

[Varney Deposition Exhibit No. 1
was marked for identification.]

Mr. Pinkus. Can I look at it?

Ms. Remington. Yes.

BY MS. REMINGTON:

Q This is CGE 46225 through 229. This is the resume of David Craig Livingstone.

Have you ever seen that before?

A Not that I recall. No, I don't think so. Mine is not this long.

Q Has he ever given you a copy of any resume of his?

A Not that I recall, no. No.

Q Going back to Deposition Exhibit 1, Mr. Livingstone, it appears, filled out this form in December of '92. Does that help refresh your recollection as to when you might have talked to him about finding a job?

A It would be very difficult for me to imagine that I had any conversation with him during the Inaugural about finding a job in the White House. It is such a time-compressed, ~~intense undertaking to put an Inaugural on. I mean;~~ there are no side-bar conversations. I mean, everybody is so focused on trying to get the Inaugural done that it is inconceivable to me that I would have talked to him about a White House job during this time.

Q So your best recollection would be sometime during that planning of the Cabinet meeting?

A Yeah.

Q And here on Deposition Exhibit 1, he had checked off on job preference, "advance."

A Uh-huh.

Q Did he ever talk to you about trying to find an advance job in the Clinton administration?

A Probably. I mean, that would be most likely. I mean, my experience with him was as an advance guy.

Q But you don't recall any specific conversation?

A I don't.

Q And here on the "from" section on the top of Deposition Exhibit 1, it says Eli Segal. Would that be the sponsor, do you have any idea?

A I don't know.

Q While you were working on PIC and getting the Inaugural ready, did you have day-to-day contact with him?

A With?

Q Craig Livingstone.

A No, it would not have been day-to-day.

Q Would you see him weekly?

A Probably weekly, yeah.

~~Q Let me go back to Mr. Livingstone's resume. You said that you had worked on the Clinton/Gore Campaign.~~

A Right.

Q Were you aware of a position in something called counter-event operations?

A No.

Q Had you ever heard of counter-event operations?

A No. That's probably not the kind of thing they would tell a lawyer about. No, I didn't know about that one.

Q Do you have any idea of what that position was, consultant to counter-event operations?

A Only what he described it as here. No, I mean, I don't know anything about it.

Q You had previously testified that Mr. Foster had explained this position as Director of Personnel Security to you and asked you whether Livingstone was capable of doing that

job; did you think that that was a political position that he was describing?

A Well, a couple of things. One is, I don't think anybody ever called it Director of Personnel Security.

Q Just for the record, it did have a different name.

A It did have a title.

Ms. Remington. It was Assistant to the Counsel to the President for Security?

Ms. Taylor. I think so.

BY MS. REMINGTON:

Q Something like that.

A It was described to me, as best as I can recall it, as one of the support positions in the Counsel's Office that they didn't want a lawyer to fill. I mean, it was described as sort of a clerical \$38-\$40,000 a year job, that they needed somebody who would know a good number of the new people coming in to help them get their paperwork done and to get it done in a timely way. It was described not as political or not political but simply as an opening, you know, one of the many openings that you try and fill at the beginning.

Q Had you ever met Jane Dannenhauer?

A I may have met her at the very beginning, or right before. I don't specifically recall, but it is conceivable that I could have met her.

Q At the time, not now, but back in '93, did you know what position Ms. Dannenhauer held in the White House?

A Again, I mean, I obviously know now, but I can't sort out if I knew then or didn't. I believe I could have met her as sort of one of the early walk-throughs and looking at all the different operations and who did what.

Q Just if this refreshes your recollection, if you filled out your paperwork early --