

Anthony Marceca.

(b) Rahm Emanuel

Mr. Emanuel does not know who was responsible for hiring Anthony Marceca.

(c) Bruce Lindsey

Mr. Lindsey does not know who was responsible for hiring Anthony Marceca.

(d) Ann Lewis

Ms. Lewis does not know who was responsible for hiring Anthony Marceca.

(e) Mike McCurry

Mr. McCurry does not know who was responsible for hiring Anthony Marceca.

Interrogatory No. 8

Please state why Anthony Marceca was hired.

Response

(a) Sidney Blumenthal

Mr. Blumenthal does not know why Mr. Marceca was hired.

(b) Rahm Emanuel

Mr. Emanuel does not know why Mr. Marceca was hired.

(c) Bruce Lindsey

Mr. Lindsey does not know why Mr. Marceca was hired.

(d) Ann Lewis

Ms. Lewis does not know why Mr. Marceca was hired.

(e) Mike McCurry

Mr. McCurry does not know why Mr. Marceca was hired.

Interrogatory No. 9

Describe any and all knowledge you have about the use of FBI background investigation files, or summary reports, or raw data on persons included in the attached list (Exhibit 1).

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge about the use of FBI background investigation files, or summary reports, or raw data on any person included in Exhibit 1. Mr. Blumenthal knows from his own appointment and vetting process that an FBI background investigation was conducted for purposes of determining his own suitability for employment. On the basis of this experience, Mr. Blumenthal believes that it is possible such investigations may have been conducted on some of the persons named in Exhibit 1, to the extent these persons were being considered for appointments in the administration.

(b) Rahm Emanuel

Mr. Emanuel has no knowledge about the use of FBI background investigation files, or summary reports, or raw data on any person included in Exhibit 1.

(c) Bruce Lindsey

Mr. Lindsey's only knowledge about the use of FBI background investigation files, or summary reports, or raw data on any person listed in Exhibit 1 pertains to nominees for high-level positions in

the Clinton Administration, whose vetting Mr. Lindsey was either involved in or aware of. Those nominees who appear on Exhibit 1 and whose names Mr. Lindsey recognizes are Bobby Ray Inman and Polly Barragan Baca.

EOP objects to Interrogatory No. 9 to the extent it seeks to discover "any and all knowledge" Mr. Lindsey has regarding these nominees, as irrelevant and overbroad, and as seeking information protected by the presidential communications and deliberative process privileges. In addition, EOP objects to providing "any and all knowledge" Mr. Lindsey has regarding these nominees, on the basis of personal privacy and Rule 26 of the Federal Rules of Civil Procedure.

(d) Ann Lewis

Ms. Lewis has no knowledge about the use of FBI background investigation files, or summary reports, or raw data on persons listed on Exhibit 1.

(e) Mike McCurry

Mr. McCurry has no knowledge about the use of FBI background investigation files, or summary reports, or raw data on any person included in Exhibit 1. To the extent that persons listed on Exhibit 1 were being considered for Clinton Administration appointments, Mr. McCurry knows from his own vetting process that an FBI background investigation is conducted. He has no knowledge, however, about how that information is used, as the vetting process is highly confidential.

Interrogatory No. 10

Identify the source of your knowledge regarding the use of FBI background investigation files, or summary reports, or raw data on persons included in the attached list (Exhibit 1) described in your answer to the above Interrogatory.

Response:

(a) Sidney Blumenthal

See Response to Interrogatory 9.

(b) Rahm Emanuel

Not applicable (see Response to Interrogatory 9).

(c) Bruce Lindsey

The source of Mr. Lindsey's knowledge is his personal involvement in the vetting process of some high-level nominees for public office in the Clinton Administration.

(d) Ann Lewis

Not applicable (see Response to Interrogatory 9).

(e) Mike McCurry

Mr. McCurry has no knowledge about the "use" of FBI materials on people listed in Exhibit 1. See Response to Interrogatory 9, 11.

Interrogatory No. 11

Describe any and all knowledge you have about the obtaining of the FBI files of former White House Travel Office employees Billy Ray Dale, John Dreylinger, Barney Brasseux, Ralph Maughan, Robert Van Eimeren, John McSweeney, or Gary Wright.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge about the obtaining of FBI files

of former White House Travel Office employees, other than what he may have read or heard in the public media.

(b) Rahm Emanuel

Mr. Emanuel has no knowledge about the obtaining of FBI files of former White House Travel Office employees, other than what he may have read or heard in the public media.

(c) Bruce Lindsey

Mr. Lindsey has no knowledge about the obtaining of FBI files of former White House Travel Office employees, other than what he may have read or heard in the public media.

(d) Ann Lewis

Ms. Lewis has no knowledge about the obtaining of FBI files of former White House Travel Office employees, other than the obtaining of the FBI summary report of Mr. Dale. Ms. Lewis' knowledge about Mr. Dale is based primarily on what she read or heard in the public media. The only other source of her knowledge was a conversation that she believes she had in June 1996 with Jane Sherburne of the White House Counsel's office, when Ms. Lewis was Deputy Director of the Clinton/Gore '96 campaign. Ms. Lewis believes that, prior to that conversation, she already knew from what had been reported in the public media that the FBI report of Mr. Dale had been obtained. She recalls that Ms. Sherburne informed her in that conversation that the FBI summary reports of other persons had been obtained as well, and that the obtaining of such files was a mistake. Although Ms. Lewis does not recall any subsequent conversations, she may have had

additional conversations with Ms. Sherburne in connection with media inquiries to the Campaign.

(e) Mike McCurry

Mr. McCurry does not recognize the names listed in this other interrogatory, other than Billy Dale. His only knowledge of the circumstances of the White House's acquisition of FBI reports of persons who no longer needed access to the White House, including Mr. Dale's, is based on information provided to him by the White House Counsel's Office, and Mr. McCurry's review of Howard Shapiro's "Report of the General Counsel on the Dissemination of FBI file Information to the White House," for the purpose of enabling Mr. McCurry to respond to media inquiries about this matter. Mr. McCurry recalls being informed by the Counsel's Office that the White House obtained the FBI files of persons who no longer needed access to the White House as a result of a bureaucratic mistake. Mr. McCurry's only other source of knowledge of the FBI files matter would come from what he has read or heard in the public media.

EOP objects to Interrogatory No. 11 to the extent it seeks to discover the substance of discussions between Mr. McCurry and the Counsel's Office on the basis of the presidential communications privilege and the deliberative process privilege.

Interrogatory No. 12

Identify the source of your knowledge regarding the obtaining of FBI files of former White House travel Office employees Billy Ray Dale, John Dreylinger, Barney Brasseux, Ralph Maughan, Robert Van Eimeren, John McSweeney, or Gary Wright described in your answer to the above Interrogatory.

Response:

(a) Sidney Blumenthal

See Response No. 11.

(b) Rahm Emanuel

See Response No. 11.

(c) Bruce Lindsey

See Response No. 11

(d) Ann Lewis

See Response No. 11.

(e) Mike McCurry

See Response No. 11.

Interrogatory No. 13

Describe any and all knowledge you have about release or use of information from Linda Tripp's Department of Defense files.

Response:

(a) Sidney Blumenthal

Mr. Blumenthal has no knowledge about the release or use of information from Linda Tripp's Department of Defense files, other than what he may have read or heard in the public media.

(b) Rahm Emanuel

Mr. Emanuel has no knowledge about the release or use of information from Linda Tripp's Department of Defense files, other than what he may have read or heard in the public media.

(c) Bruce Lindsey

Mr. Lindsey has no knowledge about the release or use of information from Linda Tripp's Department of Defense files, other than what he may have read or heard in the public media.

(d) Ann Lewis

Ms. Lewis has no knowledge about the release or use of information from Linda Tripp's DOD files, other than what she may have read or heard in the public media. After this matter was reported in the press, there may have been some brief discussion among senior White House staff about potential press inquiries on this matter, and that the White House's response to any such press inquiries should be to simply refer the matter to DOD. At no time, however, did Ms. Lewis learn of any White House involvement in the release or use of information from Ms. Tripp's DoD file.

(e) Mike McCurry

Mr. McCurry has no knowledge about the release or use of information from Linda Tripp's Department of Defense file, other than what he may have read or heard in the public media. Mr. McCurry does recall being informed by his deputy Joe Lockhart that Mr. Lockhart had received a telephone call about Linda Tripp from Jane Mayer of *The New Yorker*, and that he referred Ms. Mayer to the Department of Defense.

Interrogatory No. 14

Identify the source of your knowledge regarding the release or use of information from Linda Tripp's Department of Defense files described in your answer to the above Interrogatory.

Response:

(a) Sidney Blumenthal

See Response No. 13.

(b) Rahm Emanuel

See Response No. 13.

(c) Bruce Lindsey

See Response No. 13.

(d) Ann Lewis

See Response No. 13.

(e) Mike McCurry

See Response No. 13.

Interrogatory No. 15

Describe any and all knowledge you have about the release or use of documents from Kathleen Willey to President Clinton or his aides, release or use of documents from President Clinton or his aides to Kathleen Willey, or documents relating to telephone calls or visits between Kathleen Willey and President Clinton or his aides.

Response:

(a) Sidney Blumenthal

See Response No. 42.

(b) Rahm Emanuel

The only documents referenced in this interrogatory about which Mr. Emanuel has any knowledge are those that were publicly released in March 1998. Mr. Emanuel was generally aware of the existence of the Willey letters prior to their release, and was in favor of releasing as much information as possible in order to put Ms. Willey's "60 Minutes" appearance in context. Mr. Emanuel recalls

generally expressing that view to other senior staff around the time of the "60 Minutes" interview. Mr. Emanuel subsequently learned of the Counsel's Office decision to release the letters after the "60 Minutes" interview.

EOP objects to Interrogatory No. 15 to the extent it seeks to discover the substance of the discussions between Mr. Emanuel and senior White House staff regarding the Willey letters on the basis of the deliberative process privilege.

(c) Bruce Lindsey

The only documents referenced in this interrogatory about which Mr. Lindsey has any knowledge are those that were publicly released in March 1998.

Mr. Lindsey remembers that in the summer of 1997, he had a conversation with Linda Tripp, during which she advised him that Kathleen Willey had spoken to Michael Isikoff about an alleged encounter with the President, but that based on Ms. Tripp's knowledge, Ms. Willey's account was not true. Mr. Lindsey did not know who Ms. Willey was, so he relayed the information from Ms. Tripp to Nancy Hernreich. Ms. Hernreich conveyed to Mr. Lindsey that she had seen letters from Ms. Willey to the President which were inconsistent with Ms. Willey's statements, as conveyed to Mr. Lindsey by Ms. Tripp. Ms. Hernreich gave the letters to Mr. Lindsey, who kept them in a drawer in his office.

In March 1998, the White House learned that Ms. Willey was going to appear on "60 Minutes" to allege that the President had made an

unwelcome advance towards her. At that time, Mr. Lindsey spoke to Deputy Counsel Cheryl Mills about the letters. He conveyed to Ms. Mills that the letters portrayed a warm relationship between Ms. Willey and the President, which was inconsistent with what she apparently would convey to "60 Minutes." The weekend "60 Minutes" was to air, members of the White House Counsel's Office, including Mr. Lindsey, Ms. Mills and White House Counsel Charles Ruff, met and discussed the letters. Prior to the airing of the interview, the White House received a transcript. After reviewing the transcript, Mr. Lindsey telephoned the President, who was at Camp David, to advise him of the recommendation to release the letters. The President concurred in that recommendation. The Monday morning after "60 Minutes" aired (March 16, 1998), Ms. Mills, or someone at her direction, requested that the Office of Records Management ("ORM") gather any additional correspondence from Ms. Willey. ORM gathered all the correspondence in their records and provided it to Ms. Mills that morning. Shortly thereafter, the letters were made available to the press.

EOP objects to Interrogatory No. 15 to the extent it seeks to discover the substance of deliberations between members of the Counsel's Office, on the basis of the deliberative process privilege, the attorney/client privilege, and the work product doctrine.

(d) Ann Lewis

The only documents referenced in this interrogatory about which Ms. Lewis has any knowledge are those that were publicly released in March 1998. Ms. Lewis does not recall having any knowledge about the

release or use of documents between Ms. Willey and the President prior to their being publicly released. Ms. Lewis does have personal knowledge that Ms. Willey was interested in, and approached Ms. Lewis about, working on President Clinton's 1996 campaign.

With respect to the release of documents (the Willey letters), Ms. Lewis's knowledge is based primarily on what she read or heard in the public media. Her only other source of knowledge would have been a discussion among senior staff about responding to the media inquiries about the release of Willey letters. Although Ms. Lewis does not have a specific memory of such a discussion, she assumes it would have occurred, since Ms. Lewis appeared on "Nightline," subsequent to the release of the letters, and commented that the letters were released in order to provide some context for Ms. Willey's public statements.

(e) Mike McCurry

The only documents referenced in this interrogatory about which Mr. McCurry has any knowledge are those that were publicly released in March 1998. On the Monday following the "60 Minutes" interview, shortly before the documents (the Willey letters) were released, but after the decision was made, Mr. McCurry was informed by the White House Counsel's Office that Ms. Willey's correspondence would be publicly released. Mr. McCurry does not remember who in Counsel's office conveyed the information, but does remember that he concurred in the decision. Mr. McCurry advised the press that the letters were released in order to give context to Ms. Willey's public statements.