

**INVESTIGATION OF WHITEWATER
DEVELOPMENT CORPORATION
AND RELATED MATTERS**

DEPOSITIONS

BEFORE THE

**SPECIAL COMMITTEE TO INVESTIGATE
WHITEWATER DEVELOPMENT CORPORATION
AND RELATED MATTERS**

ADMINISTERED BY THE

**COMMITTEE ON
BANKING, HOUSING, AND URBAN AFFAIRS
UNITED STATES SENATE
ONE HUNDRED FOURTH CONGRESS**

FIRST SESSION

VOLUME III

ON

**THE INQUIRY INTO WHETHER IMPROPER CONDUCT
OCCURRED REGARDING THE WAY IN WHICH
WHITE HOUSE OFFICIALS HANDLED DOCUMENTS
IN THE OFFICE OF WHITE HOUSE DEPUTY COUNSEL
VINCENT W. FOSTER, JR., FOLLOWING HIS DEATH**

JUNE 19, 20, 21, 22, 23, 26, AND 27, 1995

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1 extent that these documents may fall within that
2 category, I think we may have to consult with the
3 White House before Ms. Gorham testifies as to
4 anything about the content of them.

5 MR. MILLS: Can we go off the record for a
6 moment?

7 MR. JOHNSON: Sure.

8 (Witness conferred with counsel.)

9 BY MR. JOHNSON:

10 Q Do you remember the question, Ms. Gorham?

11 A Would you repeat it for me.

12 MR. JOHNSON: Sure. Julie, could you read
13 it back.

14 (The reporter read the record as requested.)

15 BY MR. JOHNSON:

16 Q We were talking about the files that
17 Mr. Foster maintained in locked filing cabinets in
18 his office to which you said you didn't have access,
19 but you also had testified that sometimes you would
20 put files in his in box that you knew went in those
21 files?

22 A I would put work product, sheets of paper.

1 Q By "work product," you mean things that
2 Mr. Foster himself would create?

3 A That's correct.

4 Q And the general question here, without
5 revealing the content of any of this work product,
6 what topics do you recall?

7 A There were two. One was Sean Hadden, and
8 the other was Waco.

9 Q And when you say Waco, are you referring to
10 the Branch Davidian encounter in Waco that was very
11 much in the news? Is that the general topic?

12 A Yes.

13 Q Who is Sean Hadden, if you know?

14 A The best that I can recall -- I can't
15 remember if he was a cook or a chef or an employee in
16 the kitchen of the White House.

17 Q Are you aware of any other topics of files
18 in that filing cabinet?

19 A No.

20 Q Did you ever physically see in there?

21 A No.

22 Q So you're not even aware of what volume of