# McGowan Declaration – Exhibit G

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF COLUMBIA

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DIANE J. SCHROER, :

Plaintiff, :

v. : No. 05-CV-01090 (JR)

JAMES H. BILLINGTON, :

Defendant. :

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Washington, D.C.

Monday, March 17, 2008

Deposition of KENNETH E. LOPEZ, a witness herein, called for examination by counsel for Plaintiff in the above-entitled matter, pursuant to notice, the witness being duly sworn by DENNIS A. DINKEL, a Notary Public in and for the District of Columbia, taken at the offices of WilmerHale, LLP, 1825 Pennsylvania Avenue, N.W., Washington, D.C. at 9:36 a.m., Monday, March 17, 2008, and the proceedings being taken down by Stenotype by DENNIS A. DINKEL, FAPR, CRR, and transcribed under his direction.

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serve in that position.
Q. Are you familiar with Library of Congress regulation 2024-6?
A. Not the number per se. I don't know the titles with all the numbers. Perhaps the title.
Q. Are you familiar with the LCR regulations in the 2024 series?
A. Yes.
Q. What are those?
A. They're related to personnel security, and the employment suitability program and the personnel security program as it relates to national security clearances.
Q. Do these regulations govern how security clearance regulations are to be governed throughout the library?
A. Yes, they do.
Q. I want to ask you a few questions specifically about the regulations. Let me show you -- would it be helpful to you if I showed you a copy of the regulations?
A. Yes.

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Q. Let me show you a document marked Exhibit 4 in a prior deposition.
This was a document produced by the government in discovery and the entire set is Bates-stamped number 397 through 413. I'm sorry. I believe it starts with an earlier number. 381. Is that right? I think it starts at 381.
I would like to point your attention to the Bates-stamped page 399?
A. Okay.
Q. Within LCR 2024-6?
A. Uh-huh.
Q. Section 3 here talks about considerations that need to be taken into account when making an assessment of an individual's eligibility for a security clearance, am I right?
A. Yes.
Q. And then section 3-E at the bottom says that each of the foregoing factors, referring to the factors that were listed above, shall be evaluated in the context of the whole person, and that's a quote.
In the context of security decisions made

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at the library, what does section 3-E here mean?
A. It means to me that when you make a determination as to whether a person is eligible for a national security clearance, you look at the composite of all the factors related to making a determination and not just to single out one criteria, that you evaluate all the criteria.
Q. So is it fair to say -- well, let me ask you this. Is this section 3-E, have you ever heard this concept referred to as the whole person concept?
A. Yes. Yes.
Q. Okay. Is it fair to say the whole person concept calls for an individualized assessment of all the specific circumstances of a particular individual's case?
A. Yes.
Q. With respect to this whole person concept, do you agree that the whole person concept imposes a duty on a security officer to consider not only information that may be deemed potentially disqualifying about an applicant, but also any information about the positive and productive conduct

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and achievements of an applicant's entire life?
A. I would say it requires one to look at everything, but -- in looking at the whole person, if there's -- looking at the criteria, if there's one criteria that a person or the applicant may not meet, then certainly you need to evaluate that, even if all the other factors indicate that the person was okay. Met all the criteria.
Q. Are there any circumstances in which it is appropriate to make an adverse determination of an individual's security eligibility without ascertaining whether there are any mitigating circumstances in that individual's case?
A. I think you -- what I look for is always to look at mitigating circumstances, on any issue that's brought before us, and we evaluate that as well. And I think that's what the adjudicators look at, too. Whenever there's an issue, they factor in, are there conditions or concerns that mitigated against that particular situation or condition or act that the particular person may have performed.
Q. What constitute mitigating circumstances?

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A. Maybe in a situation where a person had alcohol abuse and were arrested for -- one time -- for driving under the influence. And a mitigating circumstance might be that they just lost their job or family member and this is a one-time thing. They went on a binge and they had drinks and shouldn't have been driving. That would be mitigating because that would show there's not a pattern of misconduct as relating to alcohol consumption. It was driven by something that caused the person to do it. They lost their job, a family member, marital situation.

That might be mitigating on why that person acted as they did.

Q. In a situation where a person presented concerns about mental health issues, what would constitute mitigating circumstances in a situation where that was a concern?

A. Well, I certainly am not an expert in mental health. I would look towards the medical profession, the medical officer. And the medical officer may, in turn, go to someone who is an expert in mental health. I am in no position to make that

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judgment.

Q. Would the fact that the individual had sought appropriate health care to address that issue be something that would constitute a mitigating circumstance?

A. Again, I would rely on what the medical evaluation of that from an expert would provide to the adjudicative process. I would rely heavily on that, their judgment, because again, I don't have the experience to go back and look at all similar cases.

Q. And are there individuals within the library itself that have expertise in the realm of medical or health issues?

A. We have a medical officer, a doctor, a physician, who is the head of the health services organization. Her specialty is general practice. And I believe -- well, I know she does seek outside -- expert consultancy if there are any particular medical issue, whether it be mental or physical that are beyond her capability as a general practitioner.

Q. And have you ever had any circumstances during your time at the library where you have needed

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to seek guidance from the health services entity at the library?

A. In relationship --

Q. In relationship to a personnel security matter?

A. No.

Q. Turning to the next page, looking at section 4-A, the second sentence there, where it says, "in cases involving potentially disqualifying issues, the personnel security officer shall make a recommendation regarding the individual's security clearance eligibility to the director of OSEP who shall make the final determination."

My question is, what constitutes a case involving potentially disqualifying issues or --

A. I mentioned one earlier, if there was a foreign relationship with a foreign individual, a close relationship that may raise a concern about a person's loyalty to the United States.

Q. Does the term "case" as used here include both matters involving applicants for employment and current employees at the library?

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A. Yes.

Q. Are you familiar with executive order 12968?

A. The number, I'm not. Maybe the title, I am, because some of these personnel security -- some of the executive orders do change over time.

Q. I will show you a document that was previously marked Exhibit 3 from a prior deposition which was produced by the government in discovery, Bates-stamped pages 367 through 380.

Take a minute to look through it and familiarize yourself with it.

A. Sure.

(Pause.)

THE WITNESS: Okay.

BY MS. McGOWAN:

Q. Are you familiar with this executive order?

A. Yes, I am.

Q. Okay. Recognizing -- well, let me ask you first --

A. And its predecessors.

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THE WITNESS: There's too many factors. It's too broad. There is no single case that you can say, this is how it would be handled. You have to look at the individual case.
BY MS. McGOWAN:
Q. Okay. Would one factor be the length of time that the individual had held security clearances until that point?
MS. DOUDS: Same objection, but you can answer, if you understand.
THE WITNESS: Not necessarily.
BY MS. McGOWAN:
Q. Recognizing that it's not a dispositive factor, is it a factor that one would look at in making that assessment?
MS. DOUDS: Same objection, but you can answer, if you understand.
THE WITNESS: I recently -- repeat the question again.
BY MS. McGOWAN:
Q. Sure. In looking at -- we were talking about the range of factors that someone would take

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into account in determining whether or not to grant reciprocity for the clearance held by an individual at another agency, where that individual revealed they were undertaking a gender transition.
I was wondering whether or not the prior history of holding a clearance by that individual was one of the factors in the mix that would be part of the assessment of the -- that individual's case?
MS. DOUDS: Same objection, but you can answer, if you understand.
THE WITNESS: It's too specific a question. You have to look at everything.
BY MS. McGOWAN:
Q. Okay. Are there any types of information that require denial of reciprocity as a categorical matter, irrespective of the facts of an individual's case?
A. Repeat the question.
Q. Sure. Are there any types of information that require denial of reciprocity as a categorical matter, irrespective of -- basically vitiating any need to engage in an individualized assessment of

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that particular case?
A. I'm still not clear on the question, what you're asking.
Q. Asked a different way, are there any cases in which the decision to deny reciprocal recognition for an individual's clearance can be made without assessing the specific facts of that individual's case?
A. I think you have to assess the facts.
MS. McGOWAN: Can we go off the record?
(Recess.)
BY MS. McGOWAN:
Q. We've been talking about the considerations involved in determining whether or not to grant reciprocal recognition of a clearance held by another agency.
A. Uh-huh. Sure.
Q. In your experience, both at the library and prior to that, what is the range of time that it has taken to assess new information in the context of determining whether or not to grant reciprocal recognition for a clearance, from the quickest to the

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most extended?
A. My experience has been that a week or less in most cases.
Q. And other than anything that we've already discussed, have there been any other cases that you're aware of in which an individual has not had their clearance granted reciprocally?
A. Not while I've been at the library.
Q. Okay. In your time moving from various government agencies, have you ever had to go through the process of having a clearance respected from one agency to the next?
A. Yes.
Q. And in your experience, how long has that process taken to basically get your clearance from one agency to be respected by another?
A. There were so few and so far away, I really couldn't give you an accurate answer -- I mean, a specific answer. I don't recall the few that I had taking very much time at all.
Q. Am I right that at the request of a selecting official, the personnel security office can

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grant a temporary waiver of the background security investigation requirement for a new library employee in a position involving a security clearance?
A. Yes.
Q. What is the role of the personnel security office with determining whether to grant a request for such a waiver?
A. The personnel security office in the case -- waivers are normally granted -- requested when there is no previous background investigation, there's no -- or there's no clearance, current or past clearance.
Then the personnel security office would evaluate a request from the selecting office for a waiver of the pre-appointment background investigation.
Q. So am I right that a waiver would not be necessary for an employee who was coming to the library already holding a clearance at their prior employer?
A. No. Well, a waiver wouldn't be required in that circumstance. If the clearance was valid and

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current and there were no issues, it could be handled as a reciprocal transfer. Then there is no waiver involved.
Q. In a situation where there was some reason why the clearance would not be granted reciprocal treatment, in that case, would there be a need for waiver of a pre-appointment background investigation in order to bring an employee on in a position involving a security clearance?
A. Back up and start again.
Q. Sure. We were talking about the fact that for employees that have a security clearance at a prior agency, if the personnel security office decides to grant reciprocity for that clearance, no waiver is needed?
A. Correct.
Q. You just have a new clearance at the library?
A. Correct.
Q. In a case where there was not going to be reciprocity of the clearance, would in that case a waiver of a pre-appointment background investigation

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be something that might be necessary to bring on an individual in a position involving a security clearance?
A. No. Because if the reciprocity wasn't going to apply, there's a reason why you wouldn't grant a waiver waiving that. There's a concern about accepting that reciprocal clearance. Waivers wouldn't play a part. If you're requesting reciprocal -- reciprocity, then that's an action in itself.
Q. And what role do you play, personally, if any, with respect to decisions about whether to grant a waiver of the pre-appointment background security investigation for a new library employee?
A. Whenever a waiver is requested for a clearance, the personnel security office checks with me. If the waiver can be granted, there are no issues, she usually tells me on the phone that they've done this check, they've done that check, there are no issues, no concerns. Then she will grant the waiver.
Q. The she in this case is Ms. Wilkins?

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A. Ms. Wilkins, correct.
However, if there are issues that she feels that she can't or won't grant the waiver alone, unilaterally, she'll come to me with the case, with the recommendation. The recommendation is either to deny the waiver or approve the waiver.
Q. And have there been any such cases where Ms. Wilkins has come to you regarding questions about whether or not to grant a waiver?
A. Yes.
Q. Tell me about those cases.
A. I can't recall the specifics, but I do know that there were one or two in my tenure where there were -- her recommendation was that these issues needed to be checked out; and I agreed with her. Let's check them out.
In the end, I don't recall what the determination was, whether the person was granted the clearance -- the waiver or they withdrew from consideration. I don't recall. But there were probably, I can recall, maybe two.
Q. And do you recall what the issues were?

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A. No, I don't recall.
Q. And would the process for determining whether or not to grant a waiver differ in any way from the kinds of assessments that would go into the determination about whether or not to grant reciprocity for a clearance?
A. No. They would generally be the same concerns, same judgments, same issues, same considerations, whether it be a waiver or accepting a clearance on a reciprocal basis.
Q. And as we talked about in the context of reciprocity, am I right to say that the process required -- or would require an individualized assessment of all the relevant facts to a particular case, right?
A. Yes. That's correct.
Q. And with respect to concerns about granting a waiver, other than sort of the process that we talked about regarding reciprocity, would there be any significant difference in the context of a waiver with respect to assessing information that was of a mental health nature?

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A. Repeat the question.
Q. Sure. We were talking about the fact that with respect to a waiver, the process was generally a similar one with respect to making individualized determination along the lines of what would happen in the context of a reciprocity determination.
And I just wanted to make sure that in the context of an employee that had a mental health concern, would the process require individualized determination in the context of a waiver assessment along the lines that we discussed in terms of reciprocity?
A. They would be similar, yes.
Q. Okay. Are there any ways in which the waiver assessment is different either as a process or substance matter from the reciprocity determination?
A. With the reciprocity, you have more information to work with, because there's a background investigation that's been completed. Where with a waiver, there may not be any background investigation. You're really starting from scratch, so there wound be a difference.

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Q. And as a practical matter, how does that play out from a timing perspective? Can a reciprocity decision be made quicker generally than a waiver decision because of that additional information or --
A. No. Not necessarily. Depends on what the issues are. Whether it be a reciprocity matter or a waiver with no prior background information, the issues can be such that they're going to take some time to evaluate, and they're going to vary depending upon the issues.
So it is no quicker or doesn't take any longer either way. Just depends on the issues involved.
Q. In your experience, are there some issues that as a general matter take longer to evaluate than others, or is it always case by case and impossible to generalize how long something will take?
A. I would say when there is a situation where a person has lived overseas for an extended period of time, and there needs to be checks done with people who are still overseas, whether they be

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foreign nationals, or U.S. government employees, because you have to go through different -- that sometimes takes longer to get the information because it is overseas.
I think everything else is pretty consistent. Again, it varies -- depends upon the depth of the issues, the records available, if you need to talk to people, whether their availability is immediate, they're out of town; whether from contacting people, you develop further information, leads that you need to check out.
Again, it depends case-by-case. It is a different one, depending upon how much information, how far you have to go to confirm or get what you need.
Q. And is that investigation something that the personnel security office does itself?
A. Sometimes the personnel security will check on something, particularly like if it is a court record or interviewing someone. But many times they will go back to OPM and ask them, officially, ask -- we say, OPM, would you go out and check on

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these particular matters; and they will.
They'll supplement the background investigation or not even supplement, they'll go out and look and investigate the specific issues that you ask them to investigate.
Q. In your experience in the context of any mental health concerns, for example, the one we talked about when you were at the Justice Department, would that inquiry be -- was that inquiry sent to OPM or was that something that was handled in-house?
A. Sometimes I would say it would go to OPM because it required a lot of interviews of third parties. Sometimes it could be handled by the personnel security staff, particularly if the people they needed to talk to are within the agency.
Q. And would it matter whether or not the individuals with whom they needed to speak were maybe not in the agency, but local, or did that not --
A. If they're local, that should speed things along, yes.
Q. And have you ever been involved in a situation where a waiver was requested for an

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individual who had disclosed they were undertaking a gender transition?
A. No.
Q. In the case of an individual undergoing a gender transition, would that disclosure require automatic rejection of a request for a waiver? Or would that need to be assessed on an individual case?
A. The latter. It would have to be assessed on an individual case.
Q. With respect to our conversation about assessments in the context of reciprocity and also with respect to waivers, is there anything else regarding the process that either applies to both of them or one versus the other specifically that we haven't addressed, so that I understand the process?
A. I can't think of any.
Q. In how many cases have you been involved in either a direct or peripheral way in hiring decisions at the library for positions involving security clearances? How many cases have been brought to your attention?
A. I would say that maybe four to six a year.

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More like four, where they come to me, because there are issues, that a decision official needs to look at the recommendation.
Q. And what in general categories have those issues been? I think we talked about, for example, an individual having foreign contacts as being a circumstance brought to your attention. What other examples?
A. Financial stability. Major.
Q. To your knowledge, how often is the personnel security office at the library asked to provide guidance regarding hiring decisions at the library for positions involving security clearances?
A. I think Cindy Wilkins is in a better position to answer that. I know selecting offices will, if they're considering someone, particularly for a national security clearance, they may ask for some preliminary information.
What they are, I don't know. Like if a person has a security clearance, or if a person doesn't have a clearance, what would need to be done. There are standard questions or standard answers.

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Q. And what kind of guidance other than what we were just talking about are they -- are the individuals in the personnel security office generally asked to provide?
A. Well, without knowing exactly the questions, I just hear from Cindy, how long is it going to take. That's a standard question. Can they bring this person on on the waiver of a background investigation. Those are the two principal questions that I'm familiar with.
Q. Does the personnel security office -- or has the personnel security office had any experience dealing with security clearance issues involving transgender applicants or employees, putting aside this case?
A. Not that I'm aware of.
Q. Are you aware of any other personnel security offices in any other federal agencies that have dealt with security clearance issues involving transgender employees?
A. No, I'm not.
Q. Do you know of any transgender federal

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employees who hold security clearances?
A. No, I'm not.
Q. Do you know of any transgender employees at the Library of Congress?
A. I know of, but I don't know them personally.
Q. Roughly how many?
A. Well, let me qualify that. Back to the definition of transgender. I don't know. There are people who dress in the opposite sex that I'm aware of. That's all I know.
Q. How many individuals are you talking about?
A. Only one that I'm aware of. I don't know personally, but I was told.
Q. And has any -- have any security clearance issues regarding that employee been brought to your attention?
A. Oh, no.
Q. Have any other issues regarding that employee ever come to your attention?
A. No. None. None at all.

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Q. Do you know where in the Library of Congress that individual works?
A. At the time I knew, that was maybe eight years ago, worked in library services. I don't know if the employee is still employed or not.
Q. At some point, did you learn that the personnel security office at the library had been asked to participate in discussions regarding a applicant for the terrorism specialist position at CRS?
A. I'm not aware of that.
Q. At any point did Cindy Wilkins discuss with you any conversations she had regarding an applicant for employment at the library who had revealed that they were undergoing a gender transition?
A. Well, she did mention to me one situation where the selecting official withdrew the tentative offer of employment.
Q. And tell me about what you learned from Ms. Wilkins in that conversation?
A. Well, she told me that it was for a

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terrorism position. And that the selecting official withdrew the offer. And that was all. Said that it didn't come officially to our office for any guidance or work, that she didn't really say any more than that to me.
Q. Did Ms. Wilkins tell you that the selecting official had sought any guidance or input from her?
A. She did say that the selecting official sought some guidance from her.
Q. And what did she tell you about that?
A. That Ms. Wilkins told her that it would -- she couldn't -- she said it would take some time. She couldn't give the selecting official an estimate of how long it would take to evaluate. That was all she told me.
Q. Did she tell you anything else regarding the guidance she gave to the selecting official?
A. No. Other than there may be some time involved. That's all she really talked to me about, that she told the selecting official, and the selecting official asked would this take any time;

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and Cynthia told me that she said it could.
Q. Did you have any conversation with Ms. Wilkins about how much time it would take to evaluate this information?
A. No, I didn't.
Q. Did Ms. Wilkins tell you what information about this applicant the selecting official had shared with her in the course of seeking guidance?
A. The only thing that Ms. Wilkins told me was that the selecting official was concerned that this was a critical position and needed to be filled quickly. And that's why she -- the selecting official expressed to Ms. Wilkins that they had to move quickly to fill the position. With the uncertainty of how long it might take, they might go in another direction. That's what she related to me.
Q. Did Ms. Wilkins share with you her knowledge of how the selecting official had come to learn that the applicant was going to be transitioning genders?
A. In a very brief statement, that they had lunch. And that was it. They had a meeting. They

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didn't even say lunch. They just said they had a meeting. And the applicant revealed to the selecting official some information that I guess I'm not -- not I guess. I think the selecting official then came to Cindy and asked what does this mean about a clearance.

And that's when we go back to where Cindy said, well, until we have information, we don't know how long it would take.

Q. Did Ms. Wilkins discuss with you what she told Ms. Preece as to what sort of information she would need in order to be able to make an assessment?

MS. DOUDS: Objection. Lacks foundation. You can answer if you understand it.

THE WITNESS: Repeat the question.

BY MS. McGOWAN:

Q. Sure. Did Ms. Wilkins discuss with you whether or not she told the selecting official what kind of information she would need about the applicant in order to make an assessment about the significance the information?

A. No, she didn't.

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Q. Did Ms. Wilkins talk to you at all about participating in any meeting regarding this applicant?

A. No, she didn't.

Q. Did Ms. Wilkins discuss with you the context in which she had been asked for guidance from the selecting official?

A. Other than how long it might take. That's the only thing she discussed with me.

Q. Did you have any conversations with Ms. Wilkins about what information one would need in order to assess the significance of an applicant's gender transition from a security clearance perspective?

A. The only thing Ms. Wilkins said to me, it may require a medical assessment.

Q. What kind of medical assessment?

A. She didn't elaborate more than that. She said -- no. She didn't say any more than that.

Q. When -- if you know -- did your conversation with Ms. Wilkins happen relative to when she had her conversation with the selecting official?

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A. I think it was shortly thereafter.

Q. But is it your understanding that the decision had already been made regarding that applicant and that position at the time that you were discussing the matter with Ms. Wilkins?

A. That's my understanding. A decision had been made.

Q. Did Ms. Wilkins indicate to you that she ever told the selecting official that she would need to start from scratch with respect to evaluating the information about this applicant?

A. I don't recall Ms. Wilkins relating that to me.

Q. Did Ms. Wilkins communicate to you that she had asked Ms. Preece for any additional information about the applicant?

A. She did not.

Q. Did Ms. Wilkins at any time communicate to you that she had conferred with anyone from the library's health services office about this issue?

A. She did not.

Q. Did Ms. Wilkins communicate to you that

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she told the selecting official that an applicant undergoing a gender transition would be unable to satisfy the security clearance requirements for the position?

A. She didn't indicate -- didn't relate that to me.

Q. Was there any discussion that you had with Ms. Wilkins about her advice to Ms. Preece regarding -- her advice to the selecting official regarding how long it would take to evaluate the information?

A. No. She didn't.

Q. What is your understanding of the information Ms. Wilkins had available to her when asked to provide guidance to the selecting official regarding the individual at issue?

A. I'm not aware of those specifics. I have no information.

Q. Did she at any time -- did Ms. Wilkins at any time communicate to you what the selecting official told her as far as the applicant?

A. No, she didn't. She did not.

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Q. In her conversations -- conversation with you, did Ms. Wilkins speculate with you about what would be involved in evaluating such information about an applicant?
A. No, she did not.
Q. Did she discuss with you at all how long it would take to evaluate this information about the applicant?
A. No, she did not.
Q. Did she say anything to you to indicate that there would be no circumstance in which an individual undergoing a gender transition could satisfy the security clearance eligibility requirements?
A. No.
Q. Have you had any other conversation with Ms. Wilkins about the terrorism specialist position or any applicant undergoing -- revealing that they had undergone a gender transition?
A. No. Nothing specific like that. The only thing she mentioned was that she was going to go to a hearing. That was months ago. That was it.

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Q. Before I move on, just so I'm clear, what do you understand to be the guidance that Ms. Wilkins provided regarding the significance, from a security clearance perspective, of the disclosure by the applicant for the terrorism specialist position about her intention to transition from male to female?
A. I don't recall her saying anything to me about that.
Q. From any other sources other than direct conversation with Ms. Wilkins, do you have an understanding of what advice the personnel security office gave the selecting official about this particular applicant?
A. No, I don't.
Q. Have you had any conversations with anybody else at the Library of Congress regarding the security clearance aspects of the disclosure by the applicant for the terrorism specialist about undergoing the gender transition?
A. No.
Q. Have you had any conversation with anyone else at the library about the hiring process for the

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terrorism specialist position at all?
A. No. Not at all.
Q. Have you ever had any conversations with anyone at the library over how, in a more general, non-case specific way the personnel security office would handle an issue regarding an applicant for employment undergoing a gender transition?
A. No.
Q. Has the personnel security office at the library ever been presented with any case of an applicant or employee dealing with a gender identity issue?
A. Not that I'm aware of.
Q. Do you know Charlotte Preece?
A. Yes. I know her.
Q. Who is she?
A. She is one of the division chiefs in the Congressional Research Service that deals in the functions of national security matters.
Q. Have you had any conversations with Ms. Preece about Diane Schroer?
A. None whatsoever.

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Q. Have you had any conversations with Ms. Preece regarding the hiring process for the terrorism specialist position?
A. No, I haven't.
Q. Have you had any conversations with Ms. Preece regarding any communications she's had with Ms. Wilkins in connection with applicants revealing information about gender transition?
A. None. No, I haven't.
Q. Did Ms. Wilkins in her conversation with you indicate that Ms. Preece had been shown -- well, let me step back.
Am I -- do you know who the selecting official was for the terrorism specialist position where this issue came up?
A. Yes.
Q. Who was that?
A. I'm told Charlotte Preece by Cindy. She told me that.
Q. Did Ms. Preece -- I'm sorry, did Ms. Wilkins in any conversation with you indicate that Ms. Preece shared with her that Ms. Schroer had

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shown her -- meaning Ms. Preece -- photos of Ms. Schroer in feminine attire?
A. No.
Q. Have you ever had any conversation with Ms. Wilkins about how others at the library would react to a co-worker who they knew or perceived to be a woman who had formerly been a man?
A. No.
Q. Have you had any conversations about that topic with anyone else at the library?
A. No, I have not.
Q. Have you ever had any conversations with Ms. Wilkins about how Congress or Members of their staff would react to working with an analyst from CRS who they knew or perceived to be a woman who had formerly been a man?
A. No, I have not.
Q. Have you ever had any conversation about that subject with anybody else at the library?
A. No, I have not.
Q. Have you ever had any discussion with Ms. Preece about the reason or reasons why

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Ms. Schroer was not selected for the terrorism specialist position?
A. No.
Q. Have you ever had any conversations with Ms. Wilkins that topic?
A. Repeat the question again.
Q. Sure. Have you ever had any conversations with Ms. Wilkins regarding the reason or reasons why Ms. Schroer was not selected for the terrorism specialist position?
A. No.
Q. Did you have any conversations with anyone else at the library about that topic?
A. No.
Q. Have you ever had any discussion with Ms. Preece regarding why she -- I'm sorry. Let me back up.
Do you know a library employee by the name of John Rollins?
A. I've heard of the name, but I don't know the person.
Q. And do you know what position at the

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library Mr. Rollins holds?
A. No, I don't.
Q. Did you ever have any discussion with Ms. Preece over why she made the recommendation that she did ultimately make regarding the terrorism specialist position?
A. No. I did not have a conversation with her.
Q. Have you ever had a conversation with Ms. Wilkins about why the selecting official made the recommendation that she did regarding the terrorism specialist position?
A. The only point that I think Ms. Wilkins mentioned to me that it was her impression that the selecting official was concerned about the time it would take to evaluate the information. That was what she told me.
Q. Are you aware, either from Ms. Wilkins or any other source, of other cases in which a selecting official has decided not to recommend a candidate for a position based on concerns about the timing of the security clearance evaluation process?

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A. No.
Q. Have you had any conversation with Ms. Preece about what her understanding of the advice that she received from Ms. Wilkins was?
A. No, I have not.
Q. Have you had any conversation with anybody at the library regarding the significance of transsexuality as a security clearance matter?
A. I have not.
Q. Have you had any conversation with anyone else outside of the library regarding the significance of transsexuality as a security clearance matter?
A. No, I have not.
Q. Have you had any conversation with anybody at the library relating to transsexuality or gender identity issues at all?
A. No, I have not.
Q. Have you had any conversations with anyone outside of the library on those topics?
A. No.
Q. Do you know Bessie Alkisswani?