

EXHIBIT 1

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Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Representative Lamborn

Review No. 21-4329

September 8, 2021

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OCE Matter (20-4329)

Interview of Doug Lamborn
Conducted Virtually
Wednesday, September 8, 2021
9:05 a.m. EST

Job: 397766

Pages: 1 - 46

Transcribed by: Sheila Martin

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Deposition of Doug Lamborn held remotely.

Pursuant to agreement, before Mawira Nyamete,
Notary Public in and for the District of Columbia.

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A P P E A R A N C E S

ON BEHALF OF THE GOVERNMENT:

INDHIRA BENITEZ, ESQUIRE

OFFICE OF CONGRESSIONAL ETHICS OF THE U.S.

HOUSE OF REPRESENTATIVES

425 3rd Street, SW

Washington, DC 20024

(202) 225-9739

ON BEHALF OF THE WITNESS, DOUG LAMBORN:

GREGG HARPER, ESQUIRE

WATKINS & EAGER

400 East Capitol Street

Jackson, Mississippi 39201

(601) 965-1890

ALSO PRESENT:

LEELA KRIEGER, Remote Tech

OMAR ASHMAWY, Esquire

ANNIE CHO, Esquire

ELISABETH JACKSON, Esquire

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E X H I B I T S

(Attached to the Transcript)

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1 P R O C E E D I N G S

2 MS. BENITEZ: So today is September 8th,
3 2021. We are conducting the remote interview of
4 Representative Doug Lamborn. Representative Lamborn
5 is represented by counsel who is here with us today,
6 Gregg Harper. Speaking is Indhira Benitez,
7 investigative counsel with the Office of
8 Congressional Ethics.

9 Present here today are two - are some of
10 my colleagues, Omar Ashmawy, Annie Cho, Elisabeth
11 Jackson.

12 Representative Lamborn has been given a
13 copy of the False Statements Act 18 USC1001. He has
14 signed, acknowledged and returned that
15 acknowledgement back to our office.

16 And Representative Lamborn, as I mentioned
17 previously, feel free to stop me during the interview
18 if you have a question or need a break.

19 WITNESS: Okay.

20 MS. BENITEZ: Excellent. So Congressman,
21 how many staffers do you have in your district
22 office?

1 WITNESS: At the current time?

2 MS. BENITEZ: Yes, currently.

3 WITNESS: Let's see. Let me count inside
4 my head here. We hired a new person about two weeks
5 ago or a week ago. So I think that brings us up to
6 seven, if I'm not mistaken, give or take one. There
7 -- it's always been six or seven over the years.

8 MS. BENITEZ: And how many do you have in
9 your DC office?

10 WITNESS: Once again, it's about seven.
11 We have a fellow who's provided by the Space Force.
12 In the past, I've had a fellow provided by the Air
13 Force or Army. If we include that person, there's
14 eight but that's not a paid employee. However, that
15 person volunteers full time and is paid to be on my
16 staff as the duties of a fellow.

17 MS. BENITEZ: And who do the staffers in
18 the district office report to?

19 WITNESS: They report to the district
20 director and/or to the chief of staff. And if
21 there's --

22 MS. BENITEZ: And is that --

1 WITNESS: And if there's a vacancy in the
2 district director's position, which there is right
3 now, they would report directly to the chief of
4 staff.

5 MS. BENITEZ: Is that the same for the DC
6 office?

7 WITNESS: Yes. Except the DC office
8 doesn't have a district director. They -- they
9 report directly to the chief of staff.

10 MS. BENITEZ: Who was in charge of hiring
11 decisions?

12 WITNESS: Well, I make the ultimate -- I
13 make the ultimate hiring decision. I'm the only --
14 I'm the only one who ultimately hires and fires.

15 MS. BENITEZ: Are you in -- directly
16 involved in the interviewing process?

17 WITNESS: Usually.

18 MS. BENITEZ: Is there any --

19 WITNESS: Yeah, usually the district or --
20 the district director and/or chief of staff will
21 interview candidates and then give me a
22 recommendation of the best people to interview for a

1 final decision and I'll make that interview and make
2 that final decision. Sometimes we keep looking if
3 the person isn't the best fit.

4 MS. BENITEZ: Is anyone else apart from
5 yourself and the chief of staff involved in the
6 interview process?

7 WITNESS: Well, anyone who has applicable
8 knowledge of the position we're filling will be asked
9 for their advice. And they may do a separate
10 interview, or they may join in on an interview. For
11 instance, the legislative director is also the deputy
12 chief of staff and he -- we -- we value his opinion.
13 And if it's a DC position to be filled, he'll usually
14 do an interview also. And in the district office, if
15 someone has knowledge of the position we're -- being
16 filled, we may ask them to sit in on the interview as
17 well.

18 MS. BENITEZ: How about on your -- on --
19 on the campaign side? Who runs the campaign?

20 WITNESS: My wife is the campaign manager
21 although I make the ultimate decisions.

22 MS. BENITEZ: And --

1 WITNESS: Although some -- some of those
2 are delegated to her to make and then she has
3 consultants in different areas like media or campaign
4 finance that will assist with making decisions in
5 those respective areas.

6 MS. BENITEZ: And are there any staffers
7 in the DC or district office who are also employed by
8 the campaign?

9 WITNESS: We -- yes, we have -- as the
10 rules allow, we do have a press relations person on
11 the campaign. That -- that happens to be Witness 4
12 [REDACTED] and she also works in the office with press
13 relations. So she wears two hats but all -- always
14 at separate times, never together.

15 MS. BENITEZ: And how is Witness 4
16 [REDACTED] paid for her campaign work?

17 WITNESS: She's given a modest monthly
18 retainer. And then as the campaign -- when the
19 campaign is concluded, depending on how busy it is --
20 or was, she'll get a lump sum payment on top of that.

21 MS. BENITEZ: And are you responsible for
22 paying Witness 4 [REDACTED] or any other staffer that

1 works on a campaign?

2 WITNESS: What do you mean am I
3 responsible?

4 MS. BENITEZ: Do you directly make the
5 payment or does your wife do it as campaign manager
6 or is there someone else who handles that?

7 WITNESS: Okay. My -- my wife is the
8 campaign manager and, as the financial compliance
9 person for the campaign, will make -- will cut a
10 check directly. And let me also say that on
11 occasion, we have -- we have asked for -- and
12 actually she has volunteered, Witness 2. She has
13 volunteered to help but we have taken her up on that
14 on a few occasions when we've needed someone to pick
15 up campaign finance checks at the post office and
16 we're out of town, especially when there's a 48-hour
17 SEC disclosure requirement in place.

18 And right before each election primary or
19 general election, there's a 48-hour window that you
20 have to disclose checks of \$1000 or more. And if you
21 don't do that, you know, you run into trouble with
22 SEC. And if we're out of town, there's no way to

1 comply with that unless we have someone on the ground
2 to pick up and look at the checks. And [Witness 2] has
3 volunteered to do that in the past, but we actually
4 paid her. We didn't want to impose on her. We
5 wanted to pay her for her time. And she always made
6 sure to do that on her personal time.

7 MS. BENITEZ: And who requested -- was it
8 you or was it your wife that requested for [Witness 2]
9 to pick up the mail when you and your wife were out
10 of town?

11 WITNESS: I think it was my wife. I think
12 it was my wife. I think -- I think -- I think [Witness
13 came to her rather than [Witness 2] coming to me with -- with
14 the offer to help in the first place as a volunteer.

15 MS. BENITEZ: Did she ask to help as a
16 general volunteer, or did she specifically ask to
17 help with picking up the mail when you were both out
18 of town?

19 WITNESS: If I remember right, because I
20 wasn't part of that conversation directly, she
21 offered to pick up mail in particular and I think she
22 did that because she had done that with a previous

1 employee that she had who was a congressman from
2 Indiana.

3 MS. BENITEZ: Have you or your wife ever
4 asked any other staffer for a similar favor or errand
5 on the campaign side?

6 WITNESS: Not that I can remember. There
7 may have been something over the last 16 years but
8 right now, at the moment, it's escaping me.

9 MS. BENITEZ: Do you know whether or not
10 your wife has ever asked any staffers for -- for help
11 on the campaign side or for personal errands?

12 WITNESS: Can you be more specific?

13 MS. BENITEZ: Sure. So has your wife ever
14 asked any other staffer apart from Witness 2 for help
15 on the campaign?

16 WITNESS: I don't remember that. I'd have
17 to ask her, but I don't remember that. There might
18 be someone who said hey, I - give me some yard signs
19 and over the weekend I'll put up some yard signs in
20 my neighborhood. There's probably -- there's
21 probably been occasions like that over the years.
22 I'd be surprised -- yeah, I think there have been

1 occasions like that. Now, you also mentioned
2 personal errands. Are you -- is that a separate
3 topic here that you're addressing?

4 MS. BENITEZ: Yeah, sure. So do you know
5 whether or not your wife has ever asked any of your
6 district or DC staffers to help her with a personal
7 errand?

8 WITNESS: My -- my understanding is that
9 my wife would not do that because that's not really
10 allowed under the congressional rules of -- of ethics
11 and she wouldn't want to run afoul of that. You
12 know, we try to follow the rules very carefully and
13 very sincerely. So I don't think she would knowingly
14 do that. I just don't think she would knowingly do
15 that.

16 MS. BENITEZ: Moving on to --

17 WITNESS: And also, we -- we try to
18 structure our lives to be very low maintenance. We
19 don't have any pets at our house. We don't have any
20 house plants inside our house because when we leave
21 town to be -- I'm in DC a lot and she comes with me
22 part of the time, we don't want to have to find

1 people whether it's neighbors or kids in the
2 neighborhood or anybody to have to take care of day-
3 to-day duties with our property. And so, we try to
4 be as low maintenance as possible. We drive
5 ourselves to the airport. I drive myself from the
6 airport in DC to the office. I know a lot of
7 congressmen have people take them around every place.
8 I try to keep that to a minimum. I try to be low
9 maintenance.

10 MS. BENITEZ: You mentioned driving
11 yourself to the airport. So you've never been picked
12 up or dropped off at the airport by a staffer?

13 WITNESS: Oh, I have -- I have on occasion
14 like when we had a car in the shop or one of my cars
15 -- it was working but it's -- and it's being used by
16 someone else in the family. So on occasion, yes.
17 And, of course, that's -- that's very ethical.
18 That's very much according to the rules and that's
19 the only reason I would do that.

20 MS. BENITEZ: And how often would you say
21 that's happened where you needed a staffer to pick
22 you up or drop you off at the airport?

1 WITNESS: Probably about ten percent of
2 the time, once - one out of ten trips. Maybe less.

3 MS. BENITEZ: Do you ever receive any
4 gifts from staffers from either office for any
5 special occasions?

6 WITNESS: Yes. It's been fairly regular,
7 not uniform though, to be -- to receive a surprise
8 Christmas present. And we will kind of do the same
9 for our staff. And we might even have a Christmas
10 party. And I -- I accept that -- I do accept that
11 because I know it's allowed under the rules --
12 ethical rules.

13 And on many of my birthdays, not all of
14 them, but on many of them, there will be a similar
15 surprise present. I don't insist on it. It's
16 certainly not a requirement of anyone's employment.

17 And my understanding from the -- either
18 the chief of staff or district director or whoever
19 might be putting that together and I'll -- I'll ask
20 after the fact because I'm not looking for something
21 like this ahead of time. I'll say hoping no one felt
22 any pressure to make that five or \$10 contribution or

1 whatever it might've been. And it's always been
2 clear to me that there's no pressure, it's optional
3 and that's made -- always made very clear.

4 MS. BENITEZ: Has your wife ever received
5 any gifts for special occasions from the staffers?

6 WITNESS: I'd have to ask her. Maybe
7 she's received a birthday present or - I'd -- I'd
8 have to ask her though.

9 MS. BENITEZ: Has there ever been a
10 birthday celebration for your wife in the office?

11 WITNESS: I think so, if I remember right.
12 I have to look at my calendar, you know, over the
13 years. But actually, I don't keep a calendar. I try
14 to remember but I think that that's been the case on
15 a -- on a few occasions.

16 MS. BENITEZ: You mentioned that often --

17 MR. HARPER: Indhira, may I interject
18 here?

19 MS. BENITEZ: Yes.

20 MR. HARPER: And when we say a birthday
21 celebration, I guess, just if we could define
22 celebration. Is that just like everybody has a slice

1 of cake, something of that nature? Could you tell us
2 a little more, Congressman?

3 WITNESS: Yeah. Yes, some -- there have
4 been times when we've had multiple "celebrations" at
5 the same time. For instance, if someone is going to
6 be leaving our office to go to another job, that
7 person's last Friday will -- and I'm usually not
8 around in the DC off -- or Colorado Springs office.
9 I'm usually in the -- it seems like I'm usually gone
10 whenever these happen. But there will be a little
11 celebration of that person having worked for us and
12 wishing them well in the future.

13 And if there's a birthday going on at the
14 same time among the staff and maybe they've included
15 my wife in on this, they'll say hey, we're having
16 some cake for so-and-so -- or so-and-so's birthday or
17 so-and-so's leaving the office. Come on by Friday
18 afternoon at 4:30 before we close at 5:00 and we'll
19 have a -- we'll have, you know, a little celebration.

20 So there won't be any gifts exchanged.
21 There will just be a -- a cake or something like that
22 and soft drinks. And I don't -- I don't allow

1 drinking in my office -- the latest rules at -- when
2 I won't get into my last chief of staff -- or last
3 district director but I don't allow drinking in the
4 offices anymore. But that's what I mean by
5 celebration, sharing a piece of cake and -- but no
6 gifts are exchanged.

7 MR. HARPER: Thank you, Congressman.

8 MS. BENITEZ: And regarding the gifts that
9 you received on special occasions, what kinds of
10 gifts did you receive on your birthday or Christmas
11 or other holidays?

12 WITNESS: Could you repeat that, please?

13 MS. BENITEZ: Sure. So you mentioned that
14 on occasion you would receive gifts from your
15 staffers. What kinds of gifts would you receive?

16 WITNESS: Well, once I received a Bible.
17 Once I received a ticket to Ford's Theater, although
18 I ended up never -- never having the time to use it,
19 unfortunately. Sometimes a gift card to a
20 restaurant. So it's been kind of all over the -- all
21 over the place you might say.

22 MS. BENITEZ: You said that you have done

1 similar things for staffers. So do staffers also
2 receive gifts of that nature?

3 WITNESS: Sometimes we have a birthday
4 celebration if -- you were talking about birthdays.
5 And -- so -- so -- so, yeah, sometimes people will -
6 in the office will celebrate each other's birthdays.
7 Whether gifts are exchanged, I don't know about it on
8 that occasion.

9 But at Christmas, my -- when we have our
10 Christmas party, my wife and I will give some modest
11 gifts to each of the staffers like the U.S. Capitol
12 Christmas ornaments that you can buy in the gift
13 shop. People seem to like that as a -- as a gift.
14 So that's an example of a gift that we've
15 traditionally given to our staff personally from --
16 over the years at Christmas time.

17 MS. BENITEZ: And apart from birthday
18 celebrations, have there been any other celebrations
19 that have taken place in the office?

20 WITNESS: It came to my attention a day or
21 two ago that my -- some of -- some of my DC's -- no,
22 no -- Colorado Springs staff wanted to have a little

1 party for my -- not a party but a recognition for my
2 daughter-in-law who had become a naturalized citizen
3 recently. And they -- I guess, they felt sorry for
4 her because she became a naturalized citizen during
5 COVID. And when she went to the courthouse in -- in
6 DC, she was not allowed to bring any people with her
7 into the courthouse, not even her husband, into the
8 courthouse when she became a citizen. Which I
9 thought was kind of unfortunate because, you know,
10 that's the kind of thing a husband wants to
11 participate in, not to mention me and Jeanie as her
12 parents-in-law.

13 So when my staff in Colorado Springs found
14 out about it and they knew she was going to be in
15 town later, they wanted to have a little
16 naturalization celebration. It was their idea. My
17 daughter-in-law didn't -- didn't come up with it.
18 Jeanie and I certainly didn't come up with it. But
19 they thought it would -- I think they did it because
20 they felt sorry for her.

21 MS. BENITEZ: You mentioned that you
22 learned about this a couple of days ago. Were you

1 present at the celebration?

2 WITNESS: I don't remember.

3 MS. BENITEZ: How did the district staff
4 learn about her naturalization?

5 WITNESS: I don't know. Probably Jeanie
6 or I talking about it.

7 MS. BENITEZ: Do you know who organized
8 the celebration?

9 WITNESS: I assume it was someone in the
10 district office. It was -- it was not a big thing on
11 my radar screen. So I don't -- I'm afraid I don't
12 know the details.

13 MS. BENITEZ: And so, you don't remember
14 -- just to clarify, you don't remember whether you
15 attended the celebration?

16 WITNESS: I don't remember if I even
17 attended.

18 MS. BENITEZ: Do you know whether your
19 wife attended?

20 WITNESS: I'd be guessing. I don't -- I
21 don't know. I assume she was there because she would
22 probably be there if my daughter-in-law was there. I

1 -- I don't know if I had a conflict or not. I
2 apologize. I don't remember.

3 MS. BENITEZ: Does this kind of
4 celebration happen often for other constituents?

5 WITNESS: Could you be more specific?

6 MS. BENITEZ: Sure. Have -- has the
7 district office or the DC office ever participating
8 -- participated in a celebration like they did for
9 your daughter-in-law for other constituents?

10 WITNESS: We have had celebrations for
11 certain momentous occasions in the district office.
12 For instance, when a gentleman who is -- in the Hanoi
13 Hilton during the Vietnam War. And he was in there
14 with John McCain. They were in the same little area.
15 Anyway, he had never received a Silver Star.

16 And through the work of my office, we
17 obtained for him a recognition that he should've
18 received, and he was granted a Silver Star which is a
19 very high decoration. And so, we had a celebration
20 for him in my district office one time. That was a
21 very special event. His family was there, and we had
22 -- I think we had cake or punch or soft drinks,

1 something like that.

2 And we've done a few things like that for
3 people over the years when they've received a special
4 recognition. I can't -- I'd have to rack my mind to
5 think of all the occasions but that's -- that's one
6 that comes immediately to my mind.

7 MS. BENITEZ: How does your wife
8 communicate with your staff?

9 WITNESS: Either in person or by phone or
10 by text or by email. Pretty much any -- any way that
11 you communicate with anyone around you.

12 MS. BENITEZ: How did -- or actually, when
13 did your wife receive an official House email
14 account?

15 WITNESS: My understanding is that she --
16 and she got that -- I didn't do that directly. She
17 did that herself. But she told me she wanted to know
18 what my schedule was. And so, that seemed to be the
19 only way technically or technologically that she
20 could make sure she had the capability of receiving
21 my schedule on a -- on a daily basis. Not that she
22 can go in and change anything because she can't. She

1 can't put things or take -- on my schedule or take
2 things off of the schedule or change things. But she
3 knows where I'm at -- at any given time.

4 So like if she's in Colorado Springs and
5 I'm in DC and we have a car in the shop that's being
6 repaired and they -- they give us an estimate and
7 it's -- it's a high estimate, which is usually the
8 case, she wants to run that by me and she wants to
9 know if I'm in committee or out of committee so she
10 can call me. And so, she'll check the calendar and
11 know if I'm available or not or other things that
12 come up, obviously, on a daily basis.

13 MS. BENITEZ: You -- you mentioned that
14 she can't add or remove things from the calendar.
15 Why is that?

16 WITNESS: Because that's really -- that's
17 in the purview of the scheduler. We -- we view that
18 as kind of an official duty. Now, the scheduler,
19 under the rules, do have the capability of doing even
20 campaign events on the schedule because that's
21 considered an essential part of their duties and it's
22 a recognized exception to the rules that staffers are

1 not involved, normally speaking, with political
2 events or duties.

3 But a scheduler, to do their job properly
4 has to deconflict conflicting appointments or events,
5 make sure there's no conflicts there. So a scheduler
6 has that ability. And I -- if I'm not mistaken, if I
7 have a -- like a dentist appointment or something
8 like that, you know, my scheduler might put that on
9 or I might put that on my schedule.

10 But -- so -- so Jeanie might mention to me
11 or she might mention to the scheduler that hey,
12 there's a dentist appointment coming up, you know, or
13 we're going to be out of town on vacation on Friday -
14 - Friday afternoon or something like that. She'll
15 let them know but -- so the scheduler can do his or
16 her job properly. But my wife doesn't do that
17 directly.

18 MS. BENITEZ: Does your wife use the email
19 account for any other purpose besides having access
20 to your schedule?

21 WITNESS: My understanding is she does not
22 use it at all. It's only to have access to this --

1 not access -- only -- only to have the ability to
2 look at the schedule.

3 MS. BENITEZ: How does she access her
4 House email account, on what device?

5 WITNESS: I'm going to -- I'm not sure.
6 I'm going to guess because she uses two devices, her
7 handheld cellphone -- her Apple cellphone or her
8 Apple laptop. So I assume it's one of those two
9 items.

10 MS. BENITEZ: And are both of those items
11 her personal devices or are one of them or both House
12 devices?

13 WITNESS: I bel -- I think they're paid
14 for with non-House funds.

15 MS. BENITEZ: Are you familiar with the
16 staffers' daily reports?

17 WITNESS: Yes. I'm the one who required
18 them in the first place.

19 MS. BENITEZ: You receive these reports
20 daily, I'm assuming?

21 WITNESS: Yes, I do. Indhira, I do. I
22 do.

1 MS. BENITEZ: And these reports, they also
2 go to your wife?

3 WITNESS: I think she has -- she can see
4 what they are. So I think she receives them somehow.

5 MS. BENITEZ: Okay. Leela, if you don't
6 mind, could you pull up tab one and mark that as
7 Exhibit A, please?

8 (Exhibit A was marked for identification
9 and is attached to the transcript.)

10 TECHNICIAN: Yes, Counsel. Thank you.
11 I'm just marking it as Exhibit A, again. So just
12 give me - thank you. Can you see, Counsel?

13 MS. BENITEZ: Yes. Thank you, Leela.
14 Congressman, can you see?

15 WITNESS: Yes, I can. I can.

16 MS. BENITEZ: Okay. Leela, could you give
17 me control?

18 TECHNICIAN: Yes, Counsel. Just give me a
19 moment. You have the control, counsel.

20 MS. BENITEZ: Thank you. So Congressman,
21 I'm just going to slowly scroll down here. Oh, one
22 second. Okay. Does this look like the daily reports

1 or at least a portion of what the daily reports --

2 WITNESS: Yes.

3 MS. BENITEZ: -- that you receive are?

4 WITNESS: Yes. Yes.

5 MS. BENITEZ: So I -- I'm going to draw
6 your attention to the to and from section here. And
7 your wife, Jeanie Lamborn, is in the to line.

8 WITNESS: Yes.

9 MS. BENITEZ: So the daily reports are
10 emailed directly to your wife?

11 WITNESS: I guess they are. Yes.

12 MS. BENITEZ: Why is that?

13 WITNESS: There are many times where we
14 have constituents who will come up to us in the
15 grocery store -- we encounter them in day-to-day life
16 and -- or they'll call us. And they'll say hey, your
17 -- your staff is helping me with a -- or helping my
18 -- my father-in-law with a veteran's issue, let's
19 say. That's a good example. How's that -- how's
20 that coming?

21 And so, if Jeanie has the ability to look
22 at the scheduling reports or the -- or the day-to-day

1 reports -- not scheduling but the day-to-day reports,
2 she'll know who's working on it so she can get them
3 together or she'll know if it's actually being worked
4 on. Sometimes things are slow getting picked up
5 because of the swamp of, you know -- a person might
6 be swamped with a lot of other duties at the time.

7 So just to make sure that constituent
8 needs are being addressed and who's working on them
9 is something that -- it seems to be -- over the
10 years, has been helpful to be able to have access to
11 for my wife because we get lots of constituents
12 talking to us almost on a daily basis about what's
13 happening with certain matters. And, you know,
14 people are very anxious about the progress of their
15 VA issues or Social Security issues or passport
16 issues or whatever the case might be.

17 MS. BENITEZ: Does your wife have an
18 official role in your office?

19 WITNESS: No, she does not.

20 MS. BENITEZ: So is she using the email --
21 it seems that she's using the email then to receive
22 the daily reports and also do your schedule. You

1 mentioned earlier that she only has access to the
2 email account to view your -- your daily schedule.
3 Does she use that email account for anything else?

4 WITNESS: I don't -- if she does, Indhira,
5 I'm not aware of it. I think -- I believe it's only
6 those two purposes.

7 MS. BENITEZ: Does she ever email staffers
8 from that email account?

9 WITNESS: I -- no. If she emails -- if
10 she needs to talk to a staffer, she'll pick up the
11 phone or she'll text or she might email from -- from
12 her own computer.

13 MS. BENITEZ: Leela, thank you. You can
14 take the exhibit off the screen.

15 TECHNICIAN: Thank you, Counsel.

16 MS. BENITEZ: And how often does your wife
17 visit the office?

18 WITNESS: Which one?

19 MS. BENITEZ: The DC office.

20 WITNESS: Okay. Well, she's with me about
21 half the time. So she'll be with me part of the time
22 during the day if she's not out visiting family or

1 doing other personal items of interest. So she'll be
2 in and out of the office maybe during the entire day
3 of a day when I'm in DC if she's with me. In the
4 Colorado Springs office, she might only go by the
5 office, I'm going to guess, twice a month, maybe two
6 or three times a month, maybe less.

7 MS. BENITEZ: Annie?

8 MS. CHO: Yeah, I actually want to follow
9 on the daily reports. Was your staff ever instructed
10 by you or the chief of staff or whoever maybe on
11 staff to send the daily reports to your wife?

12 WITNESS: I don't remember. I don't know
13 whether that happened last year or 15 years ago. I -
14 - I don't remember any -- any details surrounding it.

15 MS. CHO: Do you -- do you know how --

16 WITNESS: I think it's helpful -- I think
17 it's helpful for her to have that, so I'm glad it's
18 there.

19 MS. CHO: But you don't -- you don't
20 recall, sir, how she came into the position of
21 receiving those daily reports? You don't know --

22 WITNESS: I don't remember the genesis of

1 that.

2 MS. CHO: Okay.

3 WITNESS: But I -- but I -- I know there's
4 been a need. So I assume it's -- I assume it goes
5 way back.

6 MS. CHO: Okay.

7 MS. BENITEZ: Congressman, you mentioned
8 that your wife spends at least most of the time with
9 you when you're in DC, but she very rarely goes to
10 the district office. Do you ever have long nights in
11 your DC office where you've stayed overnight in your
12 office to sleep?

13 WITNESS: Yes.

14 MS. BENITEZ: Has your wife ever joined
15 you in your office --

16 WITNESS: Yes.

17 MS. BENITEZ: -- when you've stayed
18 overnight? How often would you say that's happened?

19 WITNESS: A lot.

20 MS. BENITEZ: Do you know whether your
21 wife has ever used any of the House computer or fax
22 machines or printers to perform any campaign related

1 work?

2 WITNESS: My understanding would be that
3 she has not because she's very aware of the ethical
4 restrictions against that and we try to follow the
5 rules.

6 MS. BENITEZ: Do you know whether your
7 wife ever borrowed a laminating machine from your
8 office to use for your campaign?

9 WITNESS: Okay. The -- the -- the
10 incident of the laminating machine, let me -- let me
11 explain it to you. And I -- I became aware that when
12 I read the complaint of the disgruntled former
13 employee who made that allegation who also said, by
14 the way, that my wife used all kinds of personal --
15 all kinds of office equipment for personal reasons.
16 And I think the accusation was personal, not campaign
17 reasons.

18 But in any case -- either case, that is
19 not true. In the case of the laminating machine,
20 that was borrowed. My wife did borrow that. She
21 borrowed it overnight to see if she wanted to buy one
22 for personal use for her art for -- you know, she's

1 an artist and she does art projects and she wondered
2 if that would be a good thing to have. So she wanted
3 to play with it and test it out. And so, she
4 borrowed it for -- I -- I think overnight.

5 She did -- she was conscientious to not
6 use any of the film that came with the office
7 laminator. She went and bought her own film because
8 the office film was paid for by taxpayers and she
9 didn't want to use up any of it. So she bought her
10 own film, played with the machine and decided yeah, I
11 want -- I want to get one of these and she went out
12 and bought one later and took that one back to the
13 office.

14 And that -- that may have been an improper
15 borrowing. I don't know. I consider it de minimis
16 but whether it was not -- de minimis or not, I became
17 aware of it afterward and I'm -- I'm sorry that it
18 happened. I wouldn't have done it that way myself
19 and I think my wife feels the same way now.

20 But it wasn't for campaign purposes. It
21 was for her art pursuit. And she decided to get a
22 laminating machine and she took that back to the

1 office afterwards -- after she had played with it and
2 -- and saw how it worked and how effective it was.

3 MS. BENITEZ: Okay. So I'd like to switch
4 gears to something -- a topic you're familiar with
5 that's been publicly reported regarding your son [REDACTED]
6 [REDACTED]. But before, I guess, we discuss [REDACTED], do
7 you have any -- do you have an assigned storage space
8 outside of your office?

9 WITNESS: Oh absolutely. Every single
10 office in all of the office buildings, including
11 Rayburn, have an assigned storage room. Over in
12 Cannon they're covered in wire and they're called the
13 -- they're called cages. In Rayburn, they -- they're
14 closed off for the most part with a locking door.
15 But it's a small -- I would say 12 x 12 room for
16 storing. And we use that to store boxes and excess
17 tables and furniture and old files, things like that.

18 MS. BENITEZ: And where is your specific
19 storage unit located?

20 WITNESS: In the subbasement.

21 MS. BENITEZ: In the Cannon or Rayburn --

22 WITNESS: Oh, it's in Rayburn, yeah. When

1 I was in Cannon, I had a Cannon storage area. But in
2 Rayburn, you -- each office has a Rayburn storage
3 area.

4 MS. BENITEZ: Who has access to your
5 storage unit?

6 WITNESS: Everyone in the office. The
7 office key works to the storage closet. So everyone
8 who has an office key has access.

9 MS. BENITEZ: When did -- when did [REDACTED]
10 move to DC?

11 WITNESS: I don't remember the exact date,
12 but he was pursuing a job with the Pentagon and
13 ultimately got that job. And he was needing to do
14 interviews and things like that and make a transition
15 from New York City to Washington. And I don't
16 remember exactly when that was, but that was the
17 circumstances surrounding it.

18 MS. BENITEZ: When [REDACTED] moved here to DC,
19 did he have access to your storage unit?

20 WITNESS: I don't -- I don't remember. I
21 don't -- I don't know if he did. I don't remember --
22 I don't remember whether he -- he did or not. If

1 what you're getting at is did he sleep there, no, he
2 never did that.

3 MS. BENITEZ: He never stayed in the
4 storage unit?

5 WITNESS: No, no. That -- that's --
6 that's -- that's a ridiculous accusation as is the
7 accusation that we had a storage unit in the U.S.
8 Capitol, which would be -- you know, across the
9 street. I -- all of that's ridiculous.

10 MS. BENITEZ: Did [REDACTED] ever store any of
11 his belongings in the storage unit?

12 WITNESS: Not that I know of.

13 MS. BENITEZ: Did he store any of his
14 belongings anywhere on Capitol grounds?

15 WITNESS: Not that I know of.

16 MS. BENITEZ: Did [REDACTED] ever stay overnight
17 --

18 WITNESS: Except what he might've had in a
19 backpack. As he was -- he was staying with me some
20 nights while he made his transition and had some
21 items in a backpack. And if you consider that
22 storage or not, I don't know.

1 MS. BENITEZ: And he was staying with you
2 where exactly?

3 WITNESS: In my office.

4 MS. BENITEZ: So he would sleep in your
5 office for a few nights?

6 WITNESS: Yes.

7 MS. BENITEZ: And the backpack would also,
8 I'm assuming, be stored in your office?

9 WITNESS: Yeah, I'm -- I didn't keep that
10 close a track but I'm assuming so.

11 MS. BENITEZ: Did you ever ask any of your
12 staffers to assist [REDACTED] in preparing for his job
13 interviews or the federal job hiring process?

14 WITNESS: I asked staff to give him the
15 same -- understanding that this is the same that they
16 would do for any veteran who was also a constituent,
17 and my son is a veteran and at the time was a
18 constituent -- to give advice if they had any advice
19 on how to apply for a federal position.

20 And I think they pointed -- they agreed to
21 do that and talked to him and pointed him in the
22 direction of some publicly available advice sites --

1 internet sites on how to write a resume and how to do
2 a job interview and some things like that. I don't
3 think it really helped him that much, but it was -- I
4 think it was helpful that they did that. And they
5 would've done that for any veteran constituent in the
6 district.

7 MS. BENITEZ: Do you remember which
8 staffer or what staffers specifically you asked to
9 help [REDACTED]?

10 WITNESS: Well, one was [REDACTED] Witness 5
11 because [REDACTED] Witness 5 was a veteran himself and at the time
12 was doing a good job in our office. And [REDACTED] Witness 2,
13 who is a veteran federal employee as well. Is not --
14 is not a veteran from the armed services but is a
15 experienced federal employee and knows the federal
16 system better than many people.

17 MS. BENITEZ: Do you know if your wife
18 also asked these staffers to help [REDACTED]?

19 WITNESS: I believe she did. Yes.

20 MS. BENITEZ: Did [REDACTED] ever come into the
21 office to discuss the federal hiring process?

22 WITNESS: I don't know if he -- I don't

1 know if he did it by phone or if he did in email if
2 he did it in person. It was -- I don't remember.

3 MS. BENITEZ: And Congressman, if you
4 don't mind, I'm going to take a very quick break off
5 camera, one or two minutes, and I'll hop back on if
6 you need to use restroom or anything.

7 MR. HARPER: Indhira, would you give us
8 that -- we're going to go off as well --

9 MS. BENITEZ: Yes.

10 MR. HARPER: -- and mute and stop video
11 and we'll be back on in a minute as well. Thank you.

12 MS. BENITEZ: Sure. So we're going off
13 the record.

14 (Whereas, a brief recess was taken.)

15 MS. BENITEZ: So Congressman, just a
16 couple of last questions for you. Has your wife ever
17 participated in interviewing any staffers for either
18 the district or DC office?

19 WITNESS: Yes, she has.

20 MS. BENITEZ: For both offices?

21 WITNESS: I believe so. Especially the
22 scheduler position. That's something that is an

1 important thing for a spouse to have a good
2 relationship with the scheduler because so much of
3 that affects the spouse's ultimate schedule as well
4 as the member's schedule when they do things
5 together.

6 MS. BENITEZ: And how long did [REDACTED] spend
7 sleeping with you in the office overnight? How many
8 days approximately?

9 WITNESS: I -- I don't remember. It
10 could've been as much as two weeks, but I don't
11 remember for sure.

12 MS. BENITEZ: Did [REDACTED] ever stay there
13 while you and your wife were both staying there?

14 WITNESS: Yes.

15 MS. BENITEZ: And where did [REDACTED] sleep
16 when you and your wife were also staying there?

17 WITNESS: I think he slept on the couch.

18 MS. BENITEZ: Where did you and your wife
19 sleep?

20 WITNESS: Okay. You're getting kind of
21 personal. I don't really want to go into that. It's
22 -- I'll just say in the office.

1 MS. BENITEZ: In the same office?

2 WITNESS: Yeah, in -- in the office, yeah.
3 And about 100 -- about 100 members sleep in their
4 office if you didn't know that.

5 MS. BENITEZ: Okay. I don't have any
6 other questions for you, Congressman. I'm not sure
7 if Annie or Omar have any - any more questions.

8 MS. CHO: Yeah. I -- I'm sorry if you've
9 already answered this. I just want to clarify,
10 Congressman. Does your wife have an official role
11 with your office, not on the campaign side?

12 WITNESS: No, not on the Congressional
13 side either.

14 MS. CHO: Okay.

15 WITNESS: Yeah. Not on the congressional
16 side. Just on the campaign side.

17 MS. CHO: Okay. Thank you.

18 WITNESS: Now, can I clarify one minor
19 question from a minute ago?

20 MS. BENITEZ: Sure.

21 WITNESS: Indhira, you asked when my son
22 was talking to my staff, and I mentioned -- about the

1 interview process for a federal job -- and I
2 mentioned -- I mentioned [Witness 2] and [Witness 5].
3 He also talked with Tony Archer.

4 MS. BENITEZ: Okay.

5 WITNESS: And in -- in his discussion with
6 Tony Archer, and this is second hand -- I'm repeating
7 what someone who was there told me -- [Witness 5] wasn't
8 asked to help but he volunteered to help and that's
9 how he became involved. So - so just to clarify
10 that there were -- that -- that Tony was asked and
11 started to talk to my son but it transitioned over to
12 [Witness 5], but it wasn't initially [Witness 5] --

13 MS. BENITEZ: Okay.

14 WITNESS: -- if that's helpful.

15 MS. BENITEZ: Thank you. Omar?

16 MR. ASHMAWY: No, I'm just going to say
17 that I didn't have any additional questions. I just
18 wanted to thank you, Congressman, for your time
19 today. We appreciate your cooperation and thank you.

20 WITNESS: You're welcome.

21 MS. BENITEZ: Likewise. I will also thank
22 you as well. And thank you, Gregg. Thank you for

1 taking time out of your vacation to sit with us.

2 MR. HARPER: And Indhira, just one -- one
3 follow-up question just going back earlier when you
4 asked if Ms. -- Mrs. Lamborn had to ask any of the
5 staff in Colorado Springs, I believe, to do anything
6 personal. I'd like to ask you, Congressman Lamborn,
7 whether or not your wife ever asked Witness 3 to
8 come to the house to move a piece of furniture during
9 his personal time?

10 WITNESS: I -- I do remember that that did
11 happen on at least one or maybe per -- perhaps two
12 occasions.

13 MR. HARPER: That's -- that's all I have,
14 Indhira.

15 MS. BENITEZ: Thank you, Gregg. Again,
16 thank you, Congressman, and we can go off the record.

17 (Off the record at 10:00 a.m.)
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EXHIBIT 2

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Witness 1

Review No. 21-4329

August 25, 2021

21-4329_0048

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OCE Rev. No. 21-4329

Interview of Witness 1
Conducted Virtually
Wednesday, August 25, 2021
10:16 a.m. EST

Job No.: 394997

Pages: 1 - 69

Transcribed by: Teresa R. Salazar

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Interview of WITNESS 1, conducted virtually.

ALL PARTIES ATTENDED REMOTELY

Pursuant to agreement, before Caleb Welsh,
Notary Public in and for the State of Maryland.

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A P P E A R A N C E S

INDHIRA BENITEZ, ESQUIRE

ANNIE CHO, EQUIRE

OMAR ASHMAWY, ESQUIRE

Office of Congressional Ethics (OCE) of the
U.S. House of Representatives

425 3rd Street, Southwest

Suite 1110

Washington, D.C. 20024

(202)225-9739

ALSO PRESENT:

Nathalie Vega, Remote Technician

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C O N T E N T S

INTERVIEW OF WITNESS 1	PAGE
By Ms. Benitez	5

E X H I B I T S

(Attached to the transcript)

WITNESS 1 INTERVIEW EXHIBIT	PAGE
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1 P R O C E E D I N G S

2 MS. BENITEZ: Okay. So on the record.
3 Today is August 25, 2021. We are conducting the
4 virtual interview of Witness 1. Mr. Witness 1 is
5 not represented by counsel. Speaking is Indhira
6 Benitez, Investigative Counsel with the Office of
7 Congressional Ethics. I'm also here with two of
8 my colleagues, Omar Ashmawy and Annie Cho.

9 Mr. Witness 1 has been given a copy of
10 18 USC 1001 and has acknowledged receipt of 18
11 USC 1001. And as I mentioned previously, Witness
12 1, please feel free to stop me if you need a
13 break, if you have a question, or if you just
14 need me to repeat a word or something that I
15 said.

16 WITNESS 1: I will do.

17 MS. BENITEZ: So we'll just jump right
18 into it. Let's start with some quick background
19 about yourself. Where are you from and what do
20 you currently do for work?

21 WITNESS 1: Background in the aspect of
22 the congressional member?

1 MS. BENITEZ: No, yourself. So where
2 are you from and where do you currently work?

3 WITNESS 1: Sorry. In Colorado
4 Springs, I run a national veteran organization
5 and -- Veteran Sheepdogs of America.

6 MS. BENITEZ: Okay. And what is your
7 -- and you run the organization, so what's your
8 official title?

9 WITNESS 1: President and chairman.

10 MS. BENITEZ: Okay. And where were you
11 before this position?

12 WITNESS 1: I was district director for
13 Congressman, Doug Lamborn, and I ran his Colorado
14 Springs office.

15 MS. BENITEZ: And how did you end up
16 working for Representative Lamborn?

17 WITNESS 1: I was contacted by their
18 chief of staff, Dale Anderson.

19 MS. BENITEZ: Okay. And how do you
20 know Dale Anderson?

21 WITNESS 1: I met him randomly through
22 politics, local politics, but the Lamborns asked

1 him to meet me to fill the position, district
2 director.

3 MS. BENITEZ: Okay. So you had a prior
4 relationship with Dale?

5 WITNESS 1: Just professionally. I'd
6 met him through the Lamborns through local
7 politics.

8 MS. BENITEZ: Okay. And how long were
9 you working for Representative Lamborn?

10 WITNESS 1: December 21st, I believe,
11 was the start date, and then my last date was
12 like Mid-January --

13 MS. BENITEZ: Okay. And you said --

14 WITNESS 1: -- of this year. Sorry.
15 So 2019, December 2019 to January 2021.

16 MS. BENITEZ: Okay. And you mentioned
17 that you met Dale through the Lamborns through
18 local politics, so you were involved with
19 Representative Lamborn and his campaign prior to
20 working for him?

21 WITNESS 1: I was chairman of the El
22 Paso County Republican Party.

1 MS. BENITEZ: Okay. And so how long
2 have you known Representative Lamborn?

3 WITNESS 1: Since 2013 through
4 politics.

5 MS. BENITEZ: And while you were
6 district director -- is that correct -- while you
7 were a district director for the congressman --

8 WITNESS 1: Yes, I was. Sorry.

9 MS. BENITEZ: No worries. Who did you
10 report to as district director?

11 WITNESS 1: I was told by Dale Anderson
12 that he was my direct report.

13 MS. BENITEZ: Okay. And did you have
14 any staffers that reported to you?

15 WITNESS 1: Yes, I had six.

16 MS. BENITEZ: And who were those
17 staffers?

18 WITNESS 1: It was Witness 3 who
19 was the faith outreach person for the
20 congressman.

21 MS. BENITEZ: Mm-hmm.

22 WITNESS 1: I was -- we had -- well --

1 I apologize. Two of my kids came down with
2 something, with COVID and everything, it jacked
3 up my day, so I apologize.

4 MS. BENITEZ: No, no worries.

5 WITNESS 1: So there's **Witness 3**,
6 who was faith outreach. There was **Witness 2** I
7 forget her last name. She was a case worker.
8 There's **Witness 4**, who was coms
9 director. There was in the beginning, Linda --
10 again, I apologize. I don't remember her last
11 name. She was the office manager who Dale had me
12 basically have -- continue to write her up. She
13 got a new job, and then Cathleen Clayton replaced
14 her, and then Tony Archer, who was the VA and
15 military liaison, and then **Witness 5**, who when
16 I came on was on the fellow program, and then we
17 hired for defense -- and then defense industry
18 for the district.

19 MS. BENITEZ: Okay. And do you have --
20 do you -- what's your relationship like with the
21 congressman?

22 WITNESS 1: Currently?

1 MS. BENITEZ: Currently, yes.

2 WITNESS 1: I'm a political leper right
3 now because of -- they're aware that I'm going to
4 be a witness and so it's not good.

5 MS. BENITEZ: So let's kind of circle
6 back to your time in his office. What were -- as
7 district director, what were some of your day-to-
8 day duties while working for the congressman?

9 WITNESS 1: I had -- my morning day was
10 basically I'd get in and we'd have a morning
11 meeting that I instituted when I first was hired.
12 Around 8 to 10, we would just do a quick review,
13 stand-up meeting on what was going on today,
14 anything specific or, you know, something like
15 that, just to know where people were. And then
16 we would just answer emails. I would have
17 meetings with different business people, elected
18 officials, government officials, and things like
19 that on what was going on. That would be the
20 normal. COVID sort of changed all that, so --

21 MS. BENITEZ: So I'm assuming that
22 after COVID, a lot of this work was done

1 virtually.

2 WITNESS 1: No. Well, we were open a
3 hundred percent the whole time. We never shut
4 down, so we had some virtual meetings. Most of
5 our meetings were virtual and we stayed in the
6 office as staff.

7 MS. BENITEZ: And it sounds like you've
8 known the congressman for some time. Have you
9 met his family?

10 WITNESS 1: One of his children and
11 Mrs. Lamborn, I've known her as -- just as long
12 as the congressman.

13 MS. BENITEZ: And what was your
14 relationship like with his child and Mrs.
15 Lamborn?

16 WITNESS 1: It was just at a
17 fundraiser. Mrs. Lamborn's and the congressman's
18 child, I had just met at the -- at a fundraiser
19 maybe six years ago and we really didn't talk.
20 It was -- well, actually, I did meet all their
21 children at a birthday party for the congressman.
22 I think it was 2019 as well. I apologize. I

1 just remembered.

2 And I met, I believe, three of their
3 children and it was more just an introduction,
4 like this is our kids, and shake hands, and that
5 was it. There was real -- no in-depth
6 conversation. And then Mrs. Lamborn, she --
7 before working for her, was mostly quiet and just
8 short, any conversation, and so really didn't
9 know her, know her but, you know, she was always
10 pleasant when we met in public.

11 MS. BENITEZ: So you didn't have
12 frequent interactions with his children or his
13 wife?

14 WITNESS 1: No. Mrs. Lamborn, I
15 probably had the same interactions before I
16 started working with him as the congressman just
17 because of different social gatherings and things
18 like that that I would go to. They were always
19 together.

20 MS. BENITEZ: And these social
21 gatherings, were they campaign-related or
22 personal? You mentioned there was a birthday in

1 2019. Was it a --

2 WITNESS 1: That was the only real
3 personal event that I ever had -- I was invited
4 to was the birthday party. And then the rest
5 were either fundraisers, or political events, or
6 things to do with the party.

7 MS. BENITEZ: Did you ever -- or did
8 the congressman ever ask you to assist his wife
9 or children at any personal matters or helping
10 with anything that didn't involve his campaign or
11 his work as a member?

12 WITNESS 1: Before working for him?

13 MS. BENITEZ: While you were working
14 for him.

15 WITNESS 1: There was personal errands,
16 mailing stuff. There was campaign things. I ran
17 their petition process in 2020, and then there
18 was sporadic campaign things that I was told to
19 take lunch to do, and then mostly it was staff
20 that did personal things.

21 MS. BENITEZ: And what kind of
22 campaign-related things would you do during

1 lunch?

2 WITNESS 1: Stuff envelopes. I had to
3 do research on ZIP codes to target different
4 areas in the district for official mail.

5 MS. BENITEZ: And how about other
6 staffers, did they also do any campaign-related
7 work?

8 WITNESS 1: Correct. [Witness 4]
9 [Witness 4] did quite a few different things, which
10 she was compensated for sometimes. Other times,
11 it was stuffing envelopes, writing things --
12 responses, articles for the campaign.

13 MS. BENITEZ: And how was [Witness 4]
14 compensated for doing the campaign work?

15 WITNESS 1: She said she was paid by
16 check late fall/early winter of 2020 because it
17 -- she was stressed about that, she -- because
18 she wasn't getting compensated for it on the
19 campaign side, so I don't know the amount but she
20 said she received a check.

21 MS. BENITEZ: And who else? So
22 [Witness 4] had done some campaign work. Who else

1 on the staff?

2 WITNESS 1: Who else knew about it,
3 I'm sorry, or --

4 MS. BENITEZ: Or who else was
5 performing kind of campaign errands or
6 activities?

7 WITNESS 1: Mostly Witness 4 and
8 myself, and then Witness 3 did a lot of
9 personal things with Zoom, setting up the
10 computer, working on the computer for Mrs.
11 Lamborn, moving things around. He would a lot of
12 times just tell me, Mrs. Lamborn called me. I
13 have to go, and it was understood that, like,
14 that took precedence under staying in the office.

15 MS. BENITEZ: Okay. I think Annie had
16 a question.

17 MS. CHO: Yeah. Hi, Witness 1.
18 Regarding the campaign activity that you or some
19 of the other staffers conducted, was that during
20 official hours, or did you guys have to take some
21 time off, you know, during your actual work day,
22 or was it done on weekends, after hours?

1 WITNESS 1: It was -- most of the
2 things that I mentioned were all done during the
3 business hour, office hours. We would -- you
4 know, stuffing envelopes, we were told if anybody
5 asked, it was -- we took it on our own lunch but
6 it would last like two or three hours. And there
7 was no, like, talk about vacation time or
8 anything like that.

9 **Witness 3**, it was, you know, it was
10 always mentioned that it was our lunch but it
11 didn't matter what time it was. It could be 9
12 o'clock in the morning, 2 in the afternoon that
13 they would go and help Mrs. Lamborn.

14 MS. CHO: Okay. Thank you.

15 MS. BENITEZ: Okay. And you said that
16 you were told if -- like, when you were doing
17 these things such as stuffing envelopes,
18 etcetera, you were told to say that you were just
19 doing this during lunch.

20 Who instructed you to say that you were
21 doing these errands during lunch?

22 WITNESS 1: Dale Anderson and Mrs.

1 Lamborn.

2 MS. BENITEZ: And to the extent that
3 Mrs. Lamborn was -- was she ever instructing you
4 specifically or more so other staffers?

5 WITNESS 1: It was either the -- Dale,
6 the chief of staff, or Mrs. Lamborn that would
7 dictate to me that -- you know, Mrs. Lamborn
8 would call my office and say that she needed me
9 or needed to talk to somebody else to have
10 something done, and then I -- or Dale would call
11 me and tell me.

12 MS. BENITEZ: So apart from yourself,
13 Witness 4, and Witness 3, were there any
14 other staffers that received similar calls from
15 Mrs. Lamborn?

16 WITNESS 1: Cathleen Clayton did and
17 also Tony Archer.

18 MS. BENITEZ: And would you be present
19 for these calls or were you kind of getting the
20 call from Mrs. Lamborn and then directing it to
21 Tony and Cathleen?

22 WITNESS 1: No. So as district

1 director, it wouldn't -- it wasn't the
2 traditional communication of I would share. Most
3 of the time, Mrs. Lamborn would call whoever she
4 needed and just dictated to them that she would
5 need them, and then I was told by that staffer
6 that I need to go to Mrs. Lamborn's house or the
7 Lamborn's house. Mrs. Lamborn called me. I
8 guess I'm taking lunch, and then we'd just like
9 -- okay. And then they would basically be gone
10 for whatever amount of time.

11 I just basically knew that -- not to
12 expect them until they showed up and I was told
13 that Mrs. Lamborn had precedence and that, if --
14 no matter -- there were certain things that we
15 were doing that were -- we needed all hands
16 helping, and she would always overrule those
17 situations still. So I just -- I was told to
18 understand that that was to be expected.

19 MS. BENITEZ: And who told you that you
20 should essentially drop everything so that Ms.
21 Lamborn -- if -- let me take that back -- that
22 you should prioritize what Ms. Lamborn needed?

1 WITNESS 1: Dale said that. He made it
2 clear several times, where it caused a lot of
3 stress and a lot of operational issues. He would
4 explain that, and then Mrs. Lamborn would say, if
5 mama ain't happy, nobody's happy sort of thing,
6 and that I take precedence, and Mrs. -- you know,
7 we needed to worry about what she wanted.

8 MS. BENITEZ: So Mrs. Lamborn mainly
9 reached out to you to perform campaign-related
10 tasks?

11 WITNESS 1: Yes.

12 MS. BENITEZ: And did you ever perform
13 any personal tasks for Mrs. Lamborn?

14 WITNESS 1: Not personal. It was
15 always dictated to other people and the staff.

16 MS. BENITEZ: And I guess on that
17 topic, have you ever been to the Lamborn's
18 personal home?

19 WITNESS 1: Before that?

20 MS. BENITEZ: Well, during your time or
21 before that, yeah.

22 WITNESS 1: Well, I had mentioned the

1 birthday party was at their house. I always
2 picked up the congressman from the airport, so we
3 would -- I was at their house several times, a
4 couple of times a month. I'd pick him from the
5 Denver airport and drive him home, or pick him up
6 from the house and drive him. And then sometimes
7 I had to drop stuff off like petitions or
8 campaign stuff. I had to pick up, you know,
9 mailers or whatnot at their print company.

10 MS. BENITEZ: And was this at Mrs.
11 Lamborn's request or the congressman's?

12 WITNESS 1: Normally, it was Mrs.
13 Lamborn and Dale Anderson.

14 MS. BENITEZ: Annie?

15 MS. CHO: Yeah. And I'm sorry if you
16 already said this, Witness 1, but you said for
17 the personal favors for Mrs. Lamborn, you said
18 they were mostly dictated to other staffers. Do
19 you know who specifically?

20 WITNESS 1: Tony Archer, Cathleen
21 Clayton, [REDACTED] Witness 4, [REDACTED] Witness 3.

22 MS. CHO: Thank you.

1 MS. BENITEZ: And do you know what kind
2 of personal favors they would -- or errands they
3 would run for Mrs. Lamborn?

4 WITNESS 1: Campaign-related, a lot of
5 tech. Tony Archer and Witness 3 would do
6 tech, set up Zoom meetings for Mrs. Lamborn, set
7 up computers, install stuff on their personal
8 computers, move furniture, things like that. And
9 then Cathleen Clayton did personal errands, mail,
10 picking up stuff at stores, and things like that.

11 MS. BENITEZ: And this was done during
12 working hours.

13 WITNESS 1: Correct. Yes, everything
14 mentioned was during working hours. And when I
15 picked up the congressman from Denver, I was
16 compensated. I was told that that was covered
17 under official business.

18 MS. BENITEZ: And how were you
19 compensated?

20 WITNESS 1: I would turn in a mileage
21 report.

22 MS. BENITEZ: And so you mentioned that

1 you had been to -- there were several times you
2 went to the congressman's personal home to either
3 pick him up, drop him off from the airport, or
4 drop off campaign mailings. Do you know whether
5 the congressman has a vacation home?

6 WITNESS 1: He has one in Wyoming that
7 he --

8 MS. BENITEZ: Have you ever been?

9 WITNESS 1: I've never been, no.

10 MS. BENITEZ: Have any of your staffers
11 been to the vacation home or have you (inaudible)
12 --

13 WITNESS 1: Not that I'm aware of. No.

14 MS. BENITEZ: What was the general
15 culture around holidays in the office, so
16 birthdays, Christmases, what was that like?

17 WITNESS 1: So Christmases, we were --
18 each office got birthday presents and we were --
19 I was told by Dale, who'd been there for 14
20 years, basically how things went. We would all
21 throw in for -- well, I say we all. Most of the
22 time, I did because I was compensated better

1 obviously than the rest of the staff, and they --
2 some of them had families. So we would throw in
3 and Dale would say the dollar amount would have
4 to range between 125 to \$200 and from each office
5 for the Lamborns. I was told to make sure if it
6 was around beer and food, it was preferred.

7 And so, I would mention to my staff,
8 hey, this is what's going on. Don't feel
9 obligated. I'm going to take care of it. And
10 some people would give money, you know, 5 to 20
11 bucks or whatever. Other people that just
12 couldn't financially afford it didn't, and I was
13 okay with that. That was the whole point of me
14 paying for it.

15 And then we would have a Christmas
16 party with like White Elephant and I was advised
17 to get something for the congressman, normally
18 like craft beer. And then for birthday parties,
19 I -- for the Lamborns, we had to have a party
20 thrown. I asked one time what -- if we would be
21 compensated for it, and Dale Anderson just
22 laughed, so we paid out of pocket. Again, that

1 was mostly myself. Staff would throw in
2 sometimes, but again, some didn't have the
3 financial ability and I was fine with that just
4 because of the circumstances.

5 And then for individuals that had
6 parties during -- like staff, we had to tell the
7 Lamborns that we were going to have a party for a
8 staff member, and if we didn't -- so the staff
9 didn't tell the Lamborns I was having a party, a
10 birthday party, and I didn't know about it
11 either, and so they threw me a party and Lamborns
12 found out about it. I got in trouble and then
13 they had a party where they basically hazed me or
14 -- not -- I'm a marine. I wouldn't say hazed,
15 but they basically made fun of me or whatnot.

16 And they told the staff to jack up my
17 room and they put most of the file cabinets and
18 stuff like that in my room and put glitter all
19 over the place and stacked stuff in there. So
20 that was -- and I was told that that was supposed
21 to be punishment for not telling the Lamborns.
22 So we made sure we told the Lamborns about

1 birthday parties, so --

2 MS. BENITEZ: And the birthday gifts
3 and the Christmas gifts that you were referring
4 to, where you would essentially take care of
5 purchasing a gift, was that just for the
6 congressman or were they gifts for his wife and
7 children as well?

8 WITNESS 1: So the gifts would be for
9 Mrs. Lamborn and the congressman, and we had to
10 make sure that -- I would tell Dale Anderson what
11 we were getting to make sure that it was his
12 approval and also the dollar amount was high
13 enough, and that the congressman and Mrs. Lamborn
14 would be okay with it.

15 And then we had one party,
16 naturalization party, that the congressman, and
17 Mrs. Lamborn, and Dale told us that we had to
18 have in 2020 for their daughter-in-law. And so
19 we threw a party and I -- for that one, because
20 of the ethics classes and everything, the day of,
21 I was like, how am I going to get compensated for
22 this? And, again, Dale Anderson just laughed.

1 So we decorated the office. We shut
2 down the office, closed it, and we had food and
3 Dale wanted me to get beer -- we always had beer
4 for the congressman -- and then we had the
5 naturalization party, so --

6 MS. BENITEZ: And --

7 WITNESS 1: -- we had like cake, and
8 food, and stuff.

9 MS. BENITEZ: And you said that you
10 were told about this party -- well, you were told
11 you had to have this party by the congressman,
12 his wife, and Dale. Was this done in person,
13 over the phone, via email?

14 WITNESS 1: It was in person. The
15 Lamborns were in town the week before, and then
16 Dale Anderson kept checking up on me over the
17 phone from D.C. to see if it was up to the
18 Lamborns' standards, was his phrase for things
19 like this.

20 MS. BENITEZ: So what was -- so before,
21 I'm assuming you did -- you weren't aware of this
22 requirement to purchase a gift, so what were the

1 instructions that you received when you started
2 as district director regarding birthday and
3 Christmas gifts?

4 WITNESS 1: The first time -- there was
5 nothing within the job description, or title, or
6 any conversation before taking the job in
7 reference to anything like that. I didn't find
8 out until later about the birthday parties for
9 staff, that the Lamborns had to know about it,
10 and then Mrs. Lamborn and the congressman's
11 birthdays were like a few months after I started,
12 and then I was informed, so there was no
13 discussion before taking the job. And then once
14 I took the ethics -- (speaking to child.)

15 Once I started and took the ethics
16 classes online and whatnot, I started asking Dale
17 and -- like how am I going to be compensated,
18 things like that. Is it, you know, going to be
19 out of the personal pocket reimbursement, and he
20 would just either -- he would just laugh and say,
21 no, this is just part of the job. And so, yeah.

22 MS. BENITEZ: So Dale Anderson told you

1 that you needed to buy gifts for the Lamborns?

2 WITNESS 1: Yes. And it was sort of a
3 competition between D.C. and district offices.

4 MS. BENITEZ: Did you ever feel that
5 you didn't have to buy the gifts?

6 WITNESS 1: No, it was -- there was no
7 option. He made it clear.

8 MS. BENITEZ: Who was -- so I know that
9 you would try to collect the money or provide the
10 funds for the gift, but who was in charge of
11 actually purchasing the gift? Was that also you?

12 WITNESS 1: Yes. I was told that I had
13 -- I would have a conversation normally with Dale
14 about the Lamborns' gifts. He would tell me what
15 the district or the D.C. office was thinking, and
16 that I had to come up with something better, and
17 then he wanted ideas from me. I would tell him
18 the ideas, and then he would pick normally what
19 would -- he thought would be the best option.
20 And then he -- I would -- he was like, well, the
21 D.C. office is doing 125, so at least do that.

22 And then I would tell the office -- the

1 staff in the meeting, like this is the plan and I
2 stopped asking them for money after I started
3 realizing that it wasn't their obligation, nor
4 mine, but it was understood that that -- I had to
5 do it. I would just tell them what I was doing
6 and then they understood the situation and some
7 people tried to give what they could.

8 But the people on the staff knew it was
9 wrong, but the environment was so toxic that we
10 had seen retaliation in the aspect of telling
11 Dale no or questioning. Vacations would be
12 canceled, or people would work over the weekend,
13 or there was things like that, so jobs would be
14 threatened, so --

15 MS. BENITEZ: And this would happen as
16 a result of staffers not doing what Dale
17 instructed them to?

18 WITNESS 1: Correct.

19 MS. BENITEZ: And what kinds of things
20 would they refuse to do?

21 WITNESS 1: And not just refuse but
22 like question. Dale, especially during COVID and

1 things like that, about keeping the office open
2 and going to teams, high-risk staffers being
3 concerned about the COVID risks, their spouses
4 being high risk. We had one person that had one
5 spouse that was -- had immune deficient, and she
6 was very concerned about it, so there was -- Dale
7 was questioned about that and repeatedly to the
8 point where one of the staffers had his vacation
9 cut short, extra workload. Things like that
10 would be brought up. Work became more difficult.

11 MS. BENITEZ: You mentioned a few names
12 of some staffers that reported to you that
13 performed some personal and campaign work for the
14 congressman and his wife. Was Witness 5 one
15 of these staffers? Did he ever perform any
16 campaign work or personal errands for Mrs.
17 Lamborn?

18 WITNESS 1: Not that I knew of because
19 he refused and it -- he made it very clear that
20 he was not going to participate once he was hired
21 full time from being a fellow.

22 MS. BENITEZ: And he -- how did he make

1 it clear that he wasn't participating in that?

2 WITNESS 1: He very tactfully mentioned
3 the ethics training and would form it as a
4 question to Dale, and that would infuriate Dale.
5 So he wouldn't be tasked to do it, but then
6 again, his vacation was canceled because
7 something would come up, so, you know, like, Dale
8 would tell me, like, get **Witness 5** here.

9 During COVID, there was a certain part
10 -- point that we were trying to do damage control
11 because we were a hundred percent in the district
12 office, so it was **Witness 5**'s day off for that. He
13 was -- he had that day off and Dale would call
14 him in and just, you know, to mess with him. So
15 I would be on the call and he would be like,
16 where's **Witness 5**? And I was like, oh, it's his
17 day off as agreed, his scheduled day, and he
18 would -- he's like, well, I want him in the
19 office. And it was a pattern, so --

20 MS. BENITEZ: And earlier, you
21 mentioned that you had -- you'd met the
22 congressman's family during a fundraiser. Did

1 you meet his son during that fundraiser?

2 WITNESS 1: I don't believe so. I
3 think it was just -- I met his son initially at
4 the birthday parties. I met three of their
5 children.

6 MS. BENITEZ: And were you working for
7 the congressman when his son moved to Washington,
8 D.C.?

9 WITNESS 1: I don't know the exact
10 dates. I couldn't tell you for sure.

11 MS. BENITEZ: But you know that his son
12 moved to the district?

13 WITNESS 1: Yes. He visited. He
14 visited the capitol when I was in the office. My
15 first week, he was -- came into the D.C. office
16 Raymond Building and I knew -- I believe to the
17 best of my ability -- that he was in D.C. living
18 while I was employed as district director because
19 they would go visit him and things like that, and
20 it would be on his calendar -- their calendar,
21 the Lamborn's calendar.

22 MS. BENITEZ: And do you know where his

1 son was living?

2 WITNESS 1: No, not -- I was told
3 certain things about him staying in the basement
4 at some point but I don't know the timeframe. I
5 was told by James Thomas, their deputy chief of
6 staff, and some of the D.C. staffers and -- told
7 me.

8 MS. BENITEZ: And what did they tell
9 you?

10 WITNESS 1: James Thomas, I would talk
11 to him because of the situation with Dale. I
12 would ask him, was this normal? Is it messed up?
13 What's going on? I would tell him the situations
14 and things I was struggling with and he would
15 share with me what was going on.

16 MS. BENITEZ: And at some point, James
17 shared with you that the congressman's son was
18 living in the capitol or living in D.C.?

19 WITNESS 1: Living in the basement. He
20 would -- he sort of gave me the background on
21 Dale and things, what was going on with -- in the
22 past with Dale. He confided in me all sort of,

1 like, you know, that Dale would do errands and in
2 the May, June timeframe, Dale got in trouble.
3 D.C. staff basically threatened to all walk out
4 if Dale was a direct report to them or they were
5 direct report to Dale, and Dale sort of lost a
6 lot of his responsibilities in D.C.

7 And so James Thomas and I talked quite
8 a bit because he knew a lot about legislation and
9 would give me -- so I would vent to him, he would
10 vent to me. And so once Dale was sort of limited
11 in D.C., James Thomas basically ran the D.C.
12 office.

13 And so Dale would do -- and Dale would
14 brag about doing errands that -- when we were
15 tasked to do something, he said, hey, I'm chief
16 of staff and I always pick up their dry cleaning.
17 I drive the Lamborns to Costco. Mrs. Lamborn, we
18 do shopping and I drive her, so no one's above
19 it. So I, again, don't know the timeframe of
20 when their son lived in the basement and when
21 they lived in the apartment or when he moved out
22 into an apartment.

1 MS. BENITEZ: And looking back to
2 **Witness 5**, you mentioned that, out of all the
3 staffers that reported to you, he was the one
4 that refused to participate in any of the
5 personal errands or campaign activities?

6 WITNESS 1: He would bring up the
7 ethics rules and -- directly to Dale and that
8 would, again, infuriate him, but he was very
9 prepared, I guess is the best way to put it, when
10 responding to Dale's unethical requests and to
11 the point where Dale would stop asking him, you
12 know, mid-summer of last year because he just
13 knew **Witness 5** would bring up the ethics.

14 MS. BENITEZ: What was the reason that
15 you left the congressman's office in January?

16 WITNESS 1: I could no longer protect
17 my staff with basically anything, protect them
18 with COVID, from Dale, from things like that.
19 The classes I took -- required classes I took
20 through the house, I knew what was going on and I
21 didn't want to be a part of it and it was -- with
22 **Witness 5**, every combat veteran left within three

1 weeks of each other. You know, the person that
2 replaced me, he just resigned six months in.

3 We knew it was wrong and it -- again,
4 it was a toxic environment where, like, Liz was
5 threatened multiple times about losing her job.
6 Things were held over her head from Dale. You
7 know, one day, he'd want me to write reports up
8 to -- you know, just in case he wanted to fire
9 somebody, and then the next time, you know, he
10 would play mind games with them.

11 It was a very abusive relationship,
12 especially with Liz. I just didn't like that
13 environment and I saw things with the congressman
14 and Dale that I knew was wrong, and I didn't want
15 to be a part of it anymore.

16 MS. BENITEZ: Annie?

17 MS. CHO: Yeah. So going back, you
18 said that **Witness 5** raised sort of the ethics
19 issues concerning sort of the tasks that were
20 asked of the staff. Prior to **Witness 5**, and I
21 mean, you've expressed some -- you know, your
22 concerns regarding the issue as well, but has

1 anyone aside from **Witness 5** sort of spoken up
2 about, you know, the ethics-related issues
3 regarding some of the tasks that you guys were
4 asked to do or --

5 WITNESS 1: Everyone brought it up at
6 some point and we'd seen -- especially **Witness 5**,
7 retaliation from Dale and it concerned a lot of
8 people. It was known if you pushed against Dale,
9 like I said, there was repercussions. So I would
10 ask, for example, like I said, it's like, you
11 know, how am I going to be compensated or, you
12 know, tasks or something, and we were told, well,
13 it -- this is on your lunch break. And so the
14 payments came in later.

15 I was -- for example, several times, I
16 was told by Dale that I was picking up the bar
17 tab at the breweries that we'd stop at a lot of
18 times after -- during the district work period
19 and it would just be put on the spot, you know,
20 you're paying for the Lamborns drinks and staff
21 drinks and stuff like that. I would bring it up
22 to James Thomas, which again was my confidant.

1 He'd been in D.C. 18 years, and he said -- he
2 agreed with me that there would be retaliation
3 and to do what I had to do.

4 And so it was -- we would bring it up,
5 most of us at least once, but a lot of staffers
6 were concerned about their jobs and vocalized
7 that. And that's one of the reasons why, like,
8 for the birthday gifts and parties, I'd pay for
9 it because, again, you know, I knew not being
10 compensated and putting the staff through it, it
11 was not a requirement by them, but I knew that --
12 from Dale, what he communicated had to happen
13 and, you know, so we were concerned for our jobs.

14 MS. CHO: And were these concerns only
15 addressed to Dale? Did anyone go to the
16 congressman directly?

17 WITNESS 1: A lot of times, the
18 Lamborns were telling us about the parties.
19 They're the one that initiated the naturalization
20 party for their daughter-in-law. You know,
21 birthday parties for staffers, you know, were
22 dictated by the Lamborns, and scheduled and, you

1 know, asked what we had and we were told that we
2 had to buy beer for the congressman.

3 MS. CHO: Were they --

4 WITNESS 1: Pardon?

5 MS. CHO: But were any of the concerns
6 that you had regarding -- were any of those
7 addressed?

8 WITNESS 1: No, because we were told
9 that this was initiated by the Lamborns, and the
10 Lamborns vocalized that this was okay, and
11 understood, and how things happened. So there
12 were -- things were being dictated to us by them,
13 so when we brought it up to Dale, he said, no,
14 this is what the Lamborns want and the Lamborns,
15 by their actions and words, would enforce that.

16 MS. CHO: Thank you.

17 WITNESS 1: So we just -- again,
18 anybody that would bring up something, especially
19 the Lamborns, we would get retaliation from --
20 especially Mrs. Lamborn, and then it would roll
21 down to Dale, and Dale would say, well, Mrs.
22 Lamborn called me. She's upset, and then, you

1 know, we'd have to have a discussion with that
2 staff -- said staff member because Mrs. Lamborn
3 would be upset that -- for whatever reason.

4 So, again, the Lamborns and Dale were
5 on the same page and Dale was sort of like the
6 enforcer of Mrs. Lamborn's -- especially Mrs.
7 Lamborn, what she wanted, but also the
8 congressman as well.

9 MS. BENITEZ: Were you still working
10 with the congressman when Witness 5 filed his
11 lawsuit against Representative Lamborn?

12 WITNESS 1: I don't believe so. I had
13 left by then I believe. I'm not sure when he
14 filed, but I think it was after.

15 MS. BENITEZ: And what was your take on
16 it? What was your opinion on the lawsuit?

17 WITNESS 1: That it was founded and
18 everything that he -- from the reports I'd read,
19 I mean, I was there. I knew what was -- I knew
20 there were grounds. I knew that was one of the
21 reasons, like I mentioned, why I left because of
22 those violations.

1 MS. BENITEZ: And did you speak to any
2 other staffers about the lawsuit? Did anyone
3 else have any opinions on it?

4 WITNESS 1: Tony Archer and Cathleen
5 Clayton. Tony Archer is the vice president of my
6 organization, the veteran org, so we talk every
7 day. And he left Mid-December because he'd been
8 there for, I think, a couple of years and he just
9 couldn't handle it anymore, the work environment
10 and just, you know, I don't want to put words in
11 his mouth, but the work environment.

12 MS. BENITEZ: And what was his opinion
13 about the lawsuit?

14 WITNESS 1: The same with myself. He
15 agreed that it was -- there was a lot of
16 violations. I mean, and we talked a lot last
17 year. 2020 was unique for everybody, obviously,
18 and when we were -- I mean, the capitol police
19 would call me once a week and check up on me, and
20 they'd mention that we were literally the only
21 office at some point that was open in the whole
22 country and in D.C.

1 Also the D.C. offices were all closed,
2 even our own, and -- but we were the only
3 district office that was a hundred percent open
4 and a hundred percent staffed. And so we, as a
5 staff, got close and had a lot of conversations.
6 A lot of staff members vented to me about, you
7 know, things, so Tony just had enough in December
8 when he resigned.

9 MS. BENITEZ: And what was -- well, I
10 guess before I ask that question, what -- how
11 would you describe Witness 5 as your employee
12 or someone who reported to you?

13 WITNESS 1: He was very Type A, very
14 analytical. He was a hard worker, especially
15 with the PPP loans, the SBA loans. He was
16 phenomenal. That's why we brought him in as a
17 fellow because of -- I mean, we were getting
18 compliments from the banking community and
19 businesses. He was on it and extremely hard
20 worker.

21 And he was the one that was the most
22 vocal and challenged Dale the most because of his

1 knowledge within -- I mean, he would study the
2 ethics, the house ethics, and the rules, and
3 workplace to bring up to Dale because Dale would
4 just, you know, I'm the chief of staff. You need
5 to be quiet. And but **Witness 5** would come in
6 basically almost like, you know, build a case
7 before certain things because he knew he had to
8 be prepared for Dale if he brought up ethics, or
9 safety, or COVID-related. So he challenged Dale
10 a lot last year, so --

11 MS. BENITEZ: Did you ever have any
12 issues with **Witness 5**'s work performance?

13 WITNESS 1: The last year, again, was
14 unique. His work was always phenomenal. At the
15 end, he would -- it was an extremely stressful
16 situation because, again, we were concerned about
17 COVID and certain staff members, and so, again,
18 we went to days off and stuff like that, giving
19 half days, trying to again, you know, knowing
20 that we were staffed a hundred percent. It
21 brought a lot of stress in the office.

22 So **Witness 5**'s work was always top notch,

1 and then one of the things -- I know I read
2 somewhere that Dale brought up that **Witness 5** would
3 storm out. Everyone in that office had issues
4 some days and I would say, go take the rest of
5 the day off because -- you know, like a mental
6 health day. And so, yeah, **Witness 5** -- there was a
7 couple of times where he, you know, it was -- he
8 would have really rough days. People would call
9 crying about losing their business and homes to,
10 you know, not getting money last year.

11 So it was extremely difficult, but I
12 did that also for every staff member, literally,
13 across the board. So whatever **Witness 5** was --
14 did, every staff member did as well, and it was a
15 unique situation. It was not just managing
16 people but emotional and mental states of the
17 staff to keep them from, you know, cracking last
18 year because, again, it was extremely stressful.

19 MS. BENITEZ: And you mentioned earlier
20 that the environment was incredibly toxic for one
21 of your staffers, Liz, and that Dale would have
22 you write her up, I think, in case he was

1 thinking of terminating her?

2 WITNESS 1: Correct. He kept -- he
3 would tell me over and over again that he wished
4 he could fire her, but he couldn't replace her
5 because of her experience as a caseworker. And
6 she was a phenomenal caseworker, but she would
7 constantly bring up concerns about her husband
8 who had Lyme disease, and his autoimmune system
9 was really bad, and he had autoimmune disease,
10 obviously. And both of -- and she was a smoker
11 and overweight. I'm not trying to be mean, but
12 that was one of her concerns. She was -- she
13 clicked several high-risk categories for COVID.

14 And so she would want, like, a filter
15 system, or UV, or some kind of protection, masks.
16 She would ask about different things about COVID,
17 and it would infuriate Dale because he would
18 downplay COVID. And so he would just complain to
19 me about Liz and her complaints and requests, and
20 then she -- he'd be like, bring in Liz and then
21 he would be basically like, Liz, you know this
22 isn't a big deal. You're just blowing it out of

1 proportion, and basically undermine her concerns
2 to the point where it was -- the closest thing
3 again I could come to is like an abusive
4 relationship where he would just demean her and
5 undermine her concerns. And she would just like,
6 you know, be downtrodden and depressed, and that
7 would be it.

8 MS. BENITEZ: What about the write ups?
9 Did you -- did he ever have you write something
10 up about Liz' poor performance or work
11 performance?

12 WITNESS 1: So Dale would get in a
13 tizzy. He would get upset, worked up. He'd want
14 me to document everything, and then when it came
15 down to it, he was like -- I would bring it up,
16 like what do you want me to do? I did this to
17 Linda, who was the office manager, when I first
18 started, **Witness 3**, and Liz, and also
19 **Witness 4**. And I would document things
20 and then we would get to it and he would talk to
21 the staff member without me, and then they would
22 come to the conclusion, whatever that was, and

1 literally, it was -- every time he'd mention like
2 document it, it never went anywhere.

3 MS. BENITEZ: So what kinds of things
4 were you documenting? Was he -- Dale was
5 instructing you to document things?

6 WITNESS 1: Correct.

7 MS. BENITEZ: And --

8 WITNESS 1: And so he would -- so it
9 would just be the situation, like Liz, she walked
10 out of the office because she was very upset
11 about Dale and the nonchalant-ness of the
12 congressman and Dale with COVID. And basically,
13 you know, like Dale told her on several
14 occasions, it's, you know, COVID, you know, is
15 only there to make sure -- you know, it's just to
16 hurt Trump. You know, it's blown out of
17 proportions, and things like that and, you know,
18 masks don't work. And he would come into the
19 office and visit the district and he would be
20 extremely upset at, or make fun of, or body
21 gestures or facial expressions to Liz about her
22 wearing a mask and distancing herself from the

1 conference table.

2 And so, you know, he was really big on
3 belligerency and disrespect, and he would go and
4 talk to me afterwards, like, you know, she has a
5 really bad attitude and say, you know, tell me,
6 like, I want you to write up Liz on, you know,
7 disrespect, belligerency, you know, things like
8 that. And then, you know, a couple of days
9 later, they would have a conversation for two or
10 three hours and I would bring it up, like what do
11 you want me to do with that? And then he's like,
12 we worked it out and --

13 MS. BENITEZ: And --

14 WITNESS 1: -- so I didn't -- would not
15 know the details, but that would be the scenario
16 almost daily.

17 MS. BENITEZ: And when you would write
18 these things up, how would you communicate them
19 to Dale? Would you email them, print them, hand
20 it to him? How would he get this write up?

21 WITNESS 1: I emailed I think one or
22 two maybe to him before, or it would be while he

1 was in the office. When he was in the office, it
2 was like knee-jerk reactions and, you know, a
3 whirlwind of different things he wanted done.
4 And so it was verbal and it was just on a
5 document and, like I said, most of the time, I
6 just deleted it because it never went anywhere,
7 and he said, oh, I worked it out with the staff
8 member.

9 A lot of the disciplinary decisions,
10 things like that were -- disciplinary and also
11 reconciling and remedial fixes within the office
12 were handled directly from Dale to the staff
13 member and a lot of times, I wasn't involved in
14 the conversations.

15 MS. BENITEZ: Did you ever do one of
16 these write ups for **Witness 5**?

17 WITNESS 1: No, I never did anything
18 until Dale vocalized that he wanted to fire
19 **Witness 5**, and he sent me an email saying basically
20 what he wanted done in the email, like what he
21 wanted me to send and say in the email and the
22 concerns I had. And then he kept on pushing for

1 more and more stuff that he wanted.

2 He kept on calling me also throughout
3 the email thread, saying that, well, can't you
4 give me more? Isn't there more? What about
5 this? And, you know, the congressman likes juicy
6 details. Like you need to make -- you know, you
7 need to put more stuff in it and I was not
8 willing to do that. So he just got frustrated
9 and basically submitted it mostly from what he
10 had added in the email and wanted me to put in,
11 so --

12 MS. BENITEZ: So I just want to pull
13 this up and make sure we're talking about the
14 same thing. So Nathalie, could you pull up Tab
15 1, please, and mark that as Exhibit A?

16 THE REMOTE TECHNICIAN: Yes. Please
17 stand by.

18 Exhibit A is up.

19 (Exhibit A was marked for identification and
20 is attached to the transcript.)

21 MS. BENITEZ: Okay. And can you scroll
22 -- actually, give Witness 1 control of the screen

1 so he can scroll down.

2 THE REMOTE TECHNICIAN: Yes. Please
3 stand by. It is ready for control now.

4 MS. BENITEZ: So, Witness 1, if you
5 scroll down on this document, I believe that
6 you'll see perhaps the email you were referring
7 to. I'll let you kind of review that and scroll
8 down.

9 WITNESS 1: Sorry. I'm trying to --

10 MS. BENITEZ: If you can't, let me know
11 and I'll --

12 WITNESS 1: Do you mind scrolling down?

13 MS. BENITEZ: Okay. No worries. And,
14 Nathalie, could you give me control of the
15 document?

16 THE REMOTE TECHNICIAN: Yes, just
17 second. One moment, please.

18 WITNESS 1: Thank you. I appreciate
19 it.

20 THE REMOTE TECHNICIAN: Yes. You have
21 control now.

22 MS. BENITEZ: Thank you. Okay. All

1 right, Witness 1. So here you see this is a
2 declaration made by Dale Anderson. And I'll kind
3 of scroll through this kind of slowly here but,
4 really, I want to draw your attention to this
5 email exchange between you and Dale that was
6 attached as an exhibit, and I'll start from the
7 bottom because I believe that's the initial
8 email. So, okay. I'll leave it up here and let
9 you read that. Let me know if you remember this
10 email exchange.

11 WITNESS 1: Yes, that's the email that
12 I was mentioning.

13 MS. BENITEZ: Okay. And when he says
14 fill in your portion, what is he referring to?

15 WITNESS 1: He wanted me to -- and
16 there was a phone call or several after this. He
17 wanted me to basically fill in what he said,
18 juicy details of **Witness 5**. And so he basically
19 wanted me to elaborate on his email and what he
20 wanted to discuss.

21 MS. BENITEZ: Okay. And this -- so I
22 scrolled up to the next message here and it looks

1 like this is your response to Dale's email. I'll
2 scroll down so you can read the whole thing.

3 WITNESS 1: Yes. So basically, I --
4 Dale called because the first email and whatnot,
5 he sent the email, he called me shortly
6 thereafter to make sure that what was in the
7 email were issues that he had. Dress wear was a
8 big one, things like that, where he was -- he had
9 concerns, so he kept calling me to make sure that
10 details were in the email that he wanted, but he
11 was never really satisfied, so he just sent it to
12 the congressman and gave it to him. I believe he
13 printed it out and -- on the way to the airport
14 one day.

15 MS. BENITEZ: And were these your words
16 or were these -- is it someone else, or did Dale
17 instruct you to write these things?

18 WITNESS 1: I was instructed by Dale.
19 Like I said, there were several phone calls to me
20 with Dale where he basically walked through what
21 he wanted, and then, again, shortly thereafter, I
22 put in my resignation.

1 MS. BENITEZ: So this email, you know,
2 because it comes from you, makes it seem like you
3 had issues with **Witness 5** as an employee. Is that
4 --

5 WITNESS 1: Oh, absolutely.
6 Absolutely. I mean, that's the way it looks.
7 Again, and that was one of the things that,
8 again, that I mentioned of why I left. I had
9 issues because, you know, I knew if I did not
10 submit that email, put in things when Dale called
11 me in that email, I was going to get terminated
12 as well, and so, again, that's -- I just couldn't
13 work in that environment anymore.

14 So Dale would call me, tell me what he
15 wanted me to elaborate in the email, things that
16 bothered him, and then he kept on saying juicy
17 details. He wanted more. You know, he would
18 call me and say, well, you know, I'm going to
19 send you an email and so, yeah.

20 MS. BENITEZ: And were these
21 observations that I see in the write up you sent
22 to Dale -- were these things observed by you or

1 by Dale?

2 WITNESS 1: Dale would bring it up. He
3 kept on bringing it up to me.

4 MS. BENITEZ: So for example --

5 WITNESS 1: He would visit the district
6 office and mention -- so our handbook hadn't been
7 updated. One of the first things I did when I
8 came in is check all the operational manuals and
9 everything. The handbook hadn't been updated
10 since 2014. So I think Liz might have signed it.
11 She'd been there. Maybe she signed it in 2014.
12 So I updated it and gave it to Dale, and it's
13 probably still in his inbox, or saved, or
14 whatever. Nothing came of it.

15 So there was a lot of conflicting
16 procedures, policies, and stuff that weren't even
17 in the handbook, so **Witness 3** and staff would
18 wear polos and khakis, polos and dress pants, and
19 Dale especially, once **Witness 5** would bring up
20 certain things, would -- Dale would get upset
21 about his outfit. You know, he was -- you know,
22 would pick out certain things. A picture, he

1 would see, you know, a staffer in a polo, and so
2 he would bring it up and have an issue, but in
3 the handbook, it allowed -- even in 2014, allowed
4 polos. So that's -- you know, I'm trying to go
5 through.

6 MS. BENITEZ: Well, let's take, for
7 example, October 6, 2020, incident.

8 WITNESS 1: Yes.

9 MS. BENITEZ: Is that something that
10 you observed?

11 WITNESS 1: So I was there. He had --
12 I told him to leave early because he was upset
13 about just -- again, it was a rough day and I had
14 sent other staffers home for the same reason of
15 just, you know, you literally take a hundred
16 calls a day of people screaming at you and it
17 drains you. I'm sure you're aware. And so
18 **Witness 5** was burnt out and got upset, and he's
19 like, I need to go home, and I was like, okay.

20 And so later that day, Dale had a
21 conversation with me. He told me -- he was
22 asking for **Witness 5** and I told him, I was like, I

1 sent him home. He was having a rough time, and
2 Dale was infuriated at that time. At that point,
3 Dale had been talking for months about firing
4 **Witness 5** because of his -- he kept on saying
5 belligerency and disrespect towards him as chief
6 of staff about not taking his orders, or not
7 obeying him, or challenging him when it comes to
8 COVID, and Liz, and other procedures in the
9 office. And so Dale was just looking for
10 anything at that point. So that really stuck
11 with him, so, yeah.

12 MS. BENITEZ: So you are --

13 WITNESS 1: (Inaudible) that mentioned
14 David Klotzman. We had the FBI look into it
15 several times and police because he called -- I
16 think we kept track one time and in three weeks,
17 he called 213 times, the office. So, like,
18 Klotzman was -- would infuriate anybody, like,
19 just he was, you know, one of those people. So
20 **Witness 5** had a phone call and Klotzman would be
21 extremely nasty on the calls and very graphic.
22 And so **Witness 5** would just get upset

1 and, you know, that day, he just, you know, was
2 burnt out. So when he said, I need to go home.
3 Do you mind? And I'm like, no, because that was
4 one of the things, again, last year, in a normal
5 situation, it would be very rare. Last year,
6 because of, again, we were a hundred percent
7 manned the whole year, and while everything was
8 going on and we started fielding phone calls from
9 all over Colorado outside our district because we
10 were, again, the only congressional office to
11 help with businesses and PPP loans.

12 So it was very stressful and so I would
13 allow staffers -- like, and that's one of the
14 things -- the last incident where **Witness 5** -- I
15 gave him the afternoon off, that Dale picked on
16 because he already knew he wanted to terminate
17 **Witness 5** and was looking for any reason at that
18 point. So I'm not surprised they brought it up,
19 but it wasn't unusual with my staff.

20 MS. BENITEZ: So in this email, would
21 you say that this email accurately reflects how
22 you perceived **Witness 5** as an employee?

1 WITNESS 1: No.

2 MS. BENITEZ: And would you say that
3 you were -- were you on the phone with Dale as
4 you typed this email or did you type this email
5 --

6 WITNESS 1: Oh, yeah. Dale basically
7 told me what he wanted me to put in the email,
8 that he was done with **Witness 5**, that he wanted to
9 basically fire **Witness 5**, and he wanted to make
10 sure that, you know, it was taken care of, and it
11 had enough substance in it to bring to the
12 congressman. And so, I'd communicated --
13 (speaking to child.)

14 So that was -- I mean, they'd already
15 -- he had his mind set. He was just building a
16 case and he called me several times to say that I
17 was not putting enough in the email. And so,
18 again, I'm not proud of it. I was, again,
19 concerned about my job because, again, I was
20 seeing what he was doing with **Witness 5**.

21 I saw what he did with Linda, the
22 office manager, and other staffers that didn't

1 listen to him. He would, you know, reduce pay
2 and fire them. And with COVID and everything,
3 I'm not going to lie, I was concerned for my job
4 and, you know, should I have said no?

5 Absolutely. But, again, I'd seen what he had
6 done before.

7 MS. BENITEZ: Nathalie, you can -- if
8 you could please take down the exhibit from the
9 screen.

10 THE REMOTE TECHNICIAN: Yes. Yes, I
11 can. Please stand by.

12 MS. BENITEZ: Thank you. And, Witness
13 1, you have made some sworn declarations, I
14 believe two, on behalf of **Witness 5** where you talk
15 about his performance as an employee.

16 WITNESS 1: Yes.

17 MS. BENITEZ: Is that correct? And
18 what did you say in those declarations?

19 WITNESS 1: I believe in general that
20 he was an excellent employee. That's why we
21 brought him on as a fellow. He was hard working.
22 Like I said, there's numerous people and

1 businesses, industry and whatnot, that, you know,
2 raved about his help and everything, and, again,
3 that he and the congressman, that's why they
4 brought him on, with his work ethic and his
5 attention to detail.

6 That's why he was given defense and
7 space industry because we were doing literally
8 everything we could to have space command, space
9 force in Colorado Springs. So he was given like
10 at that time one of the most important jobs, if
11 not the most important job. So I don't know what
12 detail -- you know, that's basically a general
13 summary.

14 MS. BENITEZ: And when was **Witness 5** --
15 do you know when **Witness 5** was terminated or if he
16 was terminated?

17 WITNESS 1: So he was terminated, but
18 he was -- basically said if you don't, you know,
19 sign the -- it was -- he was basically pushed
20 out. He was like, you're either going to be
21 fired or not. I don't know the exact date
22 honestly. I couldn't tell you.

1 MS. BENITEZ: Did you participate at
2 all in the termination or the conversations to
3 terminate **Witness 5**?

4 WITNESS 1: So what had happened is it
5 was **Witness 5**'s day off. So at that point, we were
6 -- the congressman was trying to do damage
7 control about COVID because there were several
8 things that came out. And that was another
9 dynamic with -- there was a leak, a leaker, that
10 talked to the paper, and so Dale was -- between
11 him pushing back, and COVID, and then leaker,
12 Dale was full out on **Witness 5**.

13 So we went to teams where it was 50-50
14 and **Witness 5** was off. It was, I believe, a Monday
15 and Dale had me call him in, and he came in. And
16 Dale conference called in my office, and **Witness 5**
17 sat there and Dale fired him, basically gave him
18 an ultimatum and discussed everything.

19 **Witness 5** asked him several questions
20 about, you know, well, what about this? You
21 know, and he was honest. He brought up Liz and
22 the concerns that, you know, he brought up and he

1 brought up everything that Dale -- had drove Dale
2 crazy throughout last year about the ethics of
3 workplace rights, and the masks, and COVID, and
4 everything, and he was like, is that the reason
5 why you're firing me, because it wasn't work-
6 related.

7 And Dale just lost it. And so I was
8 there as a witness, but I did not fire him. I
9 did not tell him. Dale handled the conversation
10 on the conference call.

11 MS. BENITEZ: And apart from that call
12 and the email that we just looked at, have you
13 ever voiced to Dale that you had issues with
14 **Witness 5** or any issues with his work performance?

15 WITNESS 1: Not unusual throughout the
16 staff, Dale and I would have conversations about
17 -- you know, Dale would be like, how's the staff
18 doing? And I would run down each staff member
19 and, you know, they're stressed and things like
20 that. I vocalized concerns about the stress
21 level and concerns about COVID and things like
22 that, and he just downplayed it.

1 With the actual workplace, there were
2 certain incidences in every staff, and I brought
3 up things about **Witness 5** as well that were
4 unusual, you know, than above just normal stress
5 and that's why we started doing teams, and 50-50,
6 and giving people days off to try to alleviate
7 some of that stress.

8 MS. BENITEZ: And in regard to the
9 COVID protocols or lack thereof in the office, do
10 you know who implemented or who pushed for you
11 all to be in the office a hundred percent of the
12 time? Was that Dale? Did that come from
13 Representative Lamborn?

14 WITNESS 1: Dale didn't -- Dale and the
15 Lamborns vocalized separately different times
16 that it was just blown out of proportion to stop
17 Trump. And then the protocols, we -- you know,
18 Dale would downplay like us getting masks from
19 the -- D.C. when they asked. I forget what
20 department asked for masks. He would downplay
21 it.

22 Could you repeat the question one more

1 time, please?

2 MS. BENITEZ: Sure. So I guess what
3 I'm asking is, did Congressman Lamborn also
4 express the same sentiment about COVID that Dale
5 did to the rest of the staff?

6 WITNESS 1: Correct. Yeah. We had a
7 party for -- I believe it was the congressman
8 birthday party, and he came in and we were just
9 asking, you know, small talk, how they were
10 doing, and brought up COVID. And Dale had told
11 Liz not to be over-dramatic about COVID and sort
12 of threatened her about that because of her
13 concerns. And she was -- and she wore a mask and
14 distanced herself in the office.

15 And the Lamborns both said they knew it
16 was to damage Trump's campaign and we stayed
17 open. Mrs. Lamborn said -- Mrs. Lamborn, the
18 congressman, and Dale both said the benefit of
19 keeping the office open during a campaign year
20 was crucial because several other congressmen had
21 lost or weren't doing well because their -- they
22 felt their offices were closed, so we stayed open

1 for that reason. They were concerned about the
2 campaign and the general election.

3 And so it was a shared sentiment.
4 Dale's very much a sycophant to the Lamborns. I
5 mean, he's been with them for 14 years, so he
6 parrots a lot of what they say. And so the
7 sentiment was shared across the board with the
8 Lamborns and Dale, and they both -- all three of
9 them vocalized it.

10 MS. BENITEZ: Okay. Okay. So I'm just
11 going to take a minute or two off camera just to
12 run over my notes and make sure that I don't have
13 any other questions for you. So if you don't
14 mind, I'm going to hop off and if you want to
15 take a quick break, I'll be back in two minutes.

16 WITNESS 1: All right. Thank you.

17 (OFF THE RECORD)

18 (ON THE RECORD)

19 MS. BENITEZ: Okay. So I don't think I
20 have any more questions for you. I guess one
21 last question to kind of wrap this up is, have
22 you communicated with anyone else about the OCE's

1 investigation?

2 WITNESS 1: No, other than I confirmed
3 with Wes that I got your number and I contacted
4 you.

5 MS. BENITEZ: Okay. All right. So
6 with that in mind, we can hop off the record.

7

8

(Off the record at 11:46 a.m.)

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EXHIBIT 3

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Witness 3

Review No. 21-4329
September 7, 2021

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OCE Rev. No. 21-4329

Interview of Witness 3
Conducted Virtually
Tuesday, September 7, 2021
11:30 a.m. EST

Job No. 397627
Page: 1 - 49
Transcribed by: Alexa Renfro

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Interview of Witness 3, conducted virtually.

ALL PARTIES ATTENDED REMOTELY.

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A P P E A R A N C E S

INDHIRA BENITEZ, ESQUIRE

ANNIE CHO, EQUIRE

Office of Congressional Ethics (OCE) of the

U.S. House of Representatives

425 3rd Street, Southwest, Suite 11100

Washington, D.C. 20024

202.225.9739

GREGG HARPER, ESQUIRE

WATKINS & EAGER

400 East Capitol Street

Jackson, MS 39201

601.291.6839

Also Present: Remote Technician, Vane Morrison

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C O N T E N T S

INTERVIEW OF WITNESS 3	Page
By Ms. Benitez	5
By Mr. Harper	43

E X H I B I T S

(Attached to the transcript)

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P R O C E E D I N G S

1
2 MS. BENITEZ: Today is September 7, 2021.
3 We are conducting the virtual interview of Witness
4 3. Witness 3 is represented by counsel, Greg
5 Harper, who is also present today. Speaking is
6 Indhira Benitez, Investigative Counsel with the
7 Office of Congressional Ethics. I'm also here
8 with my colleague, Annie Cho, who is joining me
9 today. Witness 3 has been given a copy of 18 USC
10 1001 and has signed the acknowledgement and
11 returned it to our office. Please feel free to
12 stop me, Witness 1, if you have any questions or
13 if you need a break.

14 How long have you been working for
15 Representative Lamborn?

16 WITNESS 3: Just over four years. Four
17 years and about four months.

18 MS. BENITEZ: And what is your current
19 title in his office?

20 WITNESS 3: I'm a senior advisor, and I do
21 faith-based outreach. It is now expanded to
22 community outreach. So I work in the District

1 office doing community outreach.

2 MS. BENITEZ: How did you meet
3 Representative Lamborn?

4 WITNESS 3: Well, I knew him as a
5 congressional member. So I had been in the
6 community serving as a pastor. And so I just knew
7 him from some of that. And then I was introduced
8 to this role -- this position by the district
9 director at that time by the name of Dale
10 Anderson. They hired me, and that is when I
11 really started to know Congressman Lamborn better.

12 MS. BENITEZ: What are some of your
13 responsibilities as the senior advisor for
14 faith-based outreach?

15 WITNESS 3: So the first thing is we
16 communicate to our constituents the services that
17 our office provides. So whether it is ministry
18 leaders, or CEOs, or whether it is pastors of
19 churches, or leaders of synagogues -- the entire
20 faith community. We are communicating these are
21 the constituent services that are available to
22 you. So when they interact with their people,

1 they know who can help them maybe overcome an IRS
2 issue, or a Social Security issue, a lot of
3 veteran issues.

4 The second part of what I do is I convene
5 -- bring the community together to talk about what
6 are some of the solutions to the problems of our
7 community, so it turns into a pretty great deal.
8 Something I really enjoy doing.

9 MS. BENITEZ: And how would you describe
10 your relationship to the Congressman today?

11 WITNESS 3: Professional. I think that is
12 the best way to describe it. Very, very,
13 professional.

14 MS. BENITEZ: Have you had an opportunity
15 to meet anyone in the Congressman's family?

16 WITNESS 3: Sure. I got to meet,
17 casually, some of the different members; the
18 children, the grandchildren. And kind of the same
19 way they got to meet some of our family members.
20 We have five children that are a little bit
21 younger than the Congressman's family, but they
22 have been able to meet some of our family. When I

1 say, professional, the Congressman has attended
2 two of the weddings for my children, which I
3 thought was professional, and I thought was also
4 courteous.

5 MS. BENITEZ: Have you had an opportunity
6 to meet the Congressman's wife?

7 WITNESS 3: I have, yes.

8 MS. BENITEZ: And how is your relationship
9 with Mrs. Lamborn?

10 WITNESS 3: It is fine. Very, very
11 professional. And I think professional,
12 respectful, and appropriately distant.

13 MS. BENITEZ: How often do you speak with
14 or interact with Representative Lamborn?

15 WITNESS 3: Oh, goodness. I can't even
16 quantify it. It is very rare. I send daily
17 report of the activities that I do to all of my
18 supervisors and a copy of that goes to the
19 Congressman. And then I send a weekend
20 faith-based outreach, so a lot of the work I do is
21 on the weekend interacting with the community. It
22 is all sent out directly to the Congressman, and

1 then the response is usually just brief. Few
2 questions here and there, and then other
3 professions -- professionally, I'll facilitate
4 when we are doing community-based outreach, and
5 the Congressman is setting up different meetings
6 with different people. And then very, very,
7 rarely we do some friendly -- for instance, we'll
8 host a staff gathering at my house. We will watch
9 the Superbowl or basketball game or something like
10 that.

11 MS. BENITEZ: Social gatherings with --

12 WITNESS 3: That is correct. Thank you
13 for the right word.

14 MS. BENITEZ: And how often do you
15 interact with Mrs. Lamborn?

16 WITNESS 3: Even more rarely than that.
17 So maybe once or twice a month is pretty much all
18 I really interact with Mrs. Lamborn.

19 MS. BENITEZ: And what is the extent of
20 your interactions?

21 WITNESS 3: Well, this is on the side, so
22 again, I'll host a prayer meeting; so we invite

1 some of the community members, some of the
2 constituents to come and pray with or pray over
3 the Lamborns. And there will be times when I
4 interact with her to find out what other prayer
5 requests that they have, and if she has any
6 special desires for that once a month meeting.
7 But that is not part of my job description. That
8 is just a personal engagement with them and the
9 community.

10 MS. BENITEZ: Has Mrs. Lamborn ever
11 reached out to you to perform any campaign related
12 work?

13 WITNESS 3: There has been some
14 opportunities. Not specifically as a reach out
15 from her but because of the work that I do with
16 this prayer group and interaction that I have had
17 with other parts, there has become some
18 opportunity to volunteer my time to maybe collect
19 signatures for a campaign or something like that.
20 But that wasn't anything I felt pressured for or
21 anything I would even reach out to. It was just
22 something that was an opportunity, and I was happy

1 to be part of something like that.

2 MS. BENITEZ: How did you learn of the
3 opportunity to volunteer for these activities?

4 WITNESS 3: I had known that there was a
5 need for signatures. So having known of the need
6 for the signatures, I asked if there was anything
7 I could do to help.

8 MS. BENITEZ: Have you ever been to the
9 Congressman's personal home?

10 WITNESS 3: I have, yes.

11 MS. BENITEZ: And how many times have you
12 visited his home?

13 WITNESS 3: I would guess, over the course
14 of all those years, maybe ten times. A couple of
15 social Christmas parties or staff social events.
16 One time, Congressman and Mrs. Lamborn were kind
17 enough to have me and my wife over. I think that
18 was especially because Mrs. Lamborn had known that
19 our youngest child was going off to college. So
20 facing the empty nest, she wanted to reach out to
21 my wife, Nancy. Social occasions like that.

22 MS. BENITEZ: Have you ever been to the

1 Lamborns' vacation home?

2 WITNESS 3: No. I was unaware that they
3 had a vacation home. If it is in Hawaii, then I'm
4 going to go a little further in wondering why I
5 haven't been invited.

6 MS. BENITEZ: Has Mrs. Lamborn ever
7 reached out to you for a personal errand where she
8 has asked you to help her with a personal errand?

9 WITNESS 3: Sure. Because there was some
10 of that personal friendship that had happened. An
11 example would be a Zoom meeting. So during COVID
12 because all of my meetings have shifted over to
13 Zoom, and, obviously, even on this, I'm not a
14 professional Zoomer; but I definitely have a
15 little more experience than others. She was
16 struggling with something, trying to have a
17 meeting with her daughter. And she would say,
18 Hey, can you help me with the Zoom?

19 And so it was something I was happy to be
20 able to help with on a personal level.

21 MS. BENITEZ: And how would you help her?
22 Would this be over the phone or in person?

1 WITNESS 3: Mostly in person.

2 MS. BENITEZ: And how would she reach out
3 to you? In person or over the phone?

4 WITNESS 3: If she needed some help, she
5 usually would contact me on the phone.

6 MS. BENITEZ: And would she call you
7 during the week? On the weekends? When would she
8 call?

9 WITNESS 3: Just whenever the meeting was.
10 Whenever she was frustrated with whatever
11 technology she was struggling with, she would call
12 on my personal cell. And if I was available, I
13 would say, Yeah, I would be happy to come and come
14 help you out.

15 MS. BENITEZ: Did she ever call you while
16 you were working?

17 WITNESS 3: There were some times that I
18 would have office hours; so I would have to leave
19 the office, take a break, and go help her.

20 MS. BENITEZ: You mentioned earlier some
21 daily reports that you would send around and
22 summarize kind of what you did for the day. Who

1 do these daily reports go to?

2 WITNESS 3: I believe -- for instance, I
3 fill it out and send it to whoever the office
4 manager of the day is. That would go to everyone
5 in the district office, everyone in the D.C.
6 office, and all of the leadership. Basically, an
7 opportunity for everybody to be informed -- here's
8 what is going on. Here's what we are putting our
9 attention to.

10 MS. BENITEZ: So for internal staff
11 members and the Congressman to be up to date with
12 what the staffers were doing?

13 WITNESS 3: Yes, that is correct.

14 MS. BENITEZ: Did these daily reports also
15 go to Mrs. Lamborn?

16 WITNESS 3: I think they do. Again, I'm
17 not aware of that. It is just a broad list, and I
18 think for her -- I think for her information on
19 those daily reports, she had been copied on them
20 as well. But once again, that is something that
21 I -- that is just my understanding. I haven't
22 even sent it out, I think I filled out the

1 district office report one time before I was
2 compiling them. And then there was a general list
3 that we send it to, so it is not like we are
4 including or excluding anyone specific.

5 MR. HARPER: If I could just interject, so
6 we don't have to go back to the topic.

7 When you did the daily report and you
8 would send it out, you would send it out to
9 whoever your supervisor was; right?

10 WITNESS 3: So on a daily basis, I'm
11 sending it to someone within the district office
12 who is compiling those reports. I send it to one
13 person.

14 MR. HARPER: And they are sending it on to
15 the district -- well, it could be the district
16 director, but they could send it on to the Chief
17 of Staff. Would that be correct?

18 WITNESS 3: They send it on to the broad
19 distribution list, whatever that distribution list
20 is.

21 MR. HARPER: Okay.

22 WITNESS 3: I may have, Gregg, done it

1 twice in all of these four years where I am trying
2 to help someone else compile the list, and then it
3 says "all staff." So there is an all-staff
4 mailing list, and it goes to everybody.

5 MR. HARPER: Thank you.

6 MS. BENITEZ: Annie?

7 MS. CHO: Hi, Witness 3.

8 To your knowledge, do you know if
9 Mrs. Lamborn holds any official role in
10 Representative Lamborn's office?

11 WITNESS 3: You know, I really don't know
12 that. I know that she has an official email as
13 far as a mail.house.gov email. But I don't know
14 the distinction between that. I know that most my
15 interaction with her is on the personal email.

16 MS. BENITEZ: Do you know what led to her
17 obtaining that official House email address?

18 MR. HARPER: If I could follow-up on
19 Annie's question.

20 Are you aware that having the official
21 email address is the way she could access her
22 husband or Congressman Lamborn's calendar?

1 WITNESS 3: You know, that would make
2 sense. But again, I just have no knowledge on
3 that.

4 MR. HARPER: That is fine. Thank you.

5 MS. BENITEZ: Vane, if you don't mind,
6 could you pull up tab one please and mark that as
7 Exhibit A?

8 THE TECHNICIAN: Yes. Please stand by.

9 (Whereupon, Exhibit A was marked for
10 identification.)

11 MS. BENITEZ: Vane, if you don't mind, can
12 you please give Witness 3 control of the screen?

13 WITNESS 3: I'm going to need a little bit
14 of help. I may have mentioned I have a detached
15 retina, so vision is a little bit of a challenge
16 here.

17 MS. BENITEZ: Sure. We will zoom in here.

18 WITNESS 3: Okay. Go ahead.

19 MS. BENITEZ: Witness 3, I would like for
20 you to scroll through these emails and see if this
21 is similar to the daily reporting that you do and
22 other staffers do.

1 WITNESS 3: So this looks like it is the
2 kind that is sent to -- for instance, in this case
3 Witness 2 organized her report and then she
4 sent it to Linda Rutzen. Linda would have been
5 compiling it that day. But there is also a
6 format. This is clearly not following the format
7 of bullet points for the different activities.

8 MS. BENITEZ: Could you scroll down to the
9 next page?

10 Here, you mention there is a format with
11 bullet points. Is this more in line?

12 WITNESS 3: That is more familiar -- yes,
13 that is the more familiar format that I'm aware
14 of. This would be -- it looks like this is the
15 one where Linda compiled it that day and sent it
16 to the distribution list right there.

17 MS. BENITEZ: Right. So you see -- I want
18 to draw your attention to right above the subject
19 line where you see who the daily reports are
20 directed to.

21 WITNESS 3: Okay.

22 MS. BENITEZ: And you see Doug Lamborn,

1 Jeanie Lamborn, and District, and D.C. Staff;
2 correct?

3 WITNESS 3: Yes. So that would be
4 consistent with that all-staff list that I had
5 talked about.

6 MS. BENITEZ: Do you find it odd that
7 Mrs. Lamborn would be getting daily reports from
8 staffers?

9 WITNESS 3: Not really. I don't find it
10 odd. Simply, because I think she has an interest
11 with who is meeting who, what is going on. I
12 think it is just a matter of being informed. So
13 no, I don't find that odd.

14 MS. BENITEZ: You said you are not aware
15 of Mrs. Lamborn having an official role in the
16 office?

17 WITNESS 3: Yes. That is not something
18 I'm privy to.

19 MS. BENITEZ: Would you find it odd if she
20 didn't have an official role in the office, and
21 she was still receiving the office daily reports?

22 WITNESS 3: No. I just consider her an

1 engaged, interested spouse.

2 MR. HARPER: I just think that -- Indhira,
3 that is calling for inflammation or a conclusion
4 that he is not going to be privy to. So I just
5 want to make sure we are staying on track here.
6 Certainly, it is not unusual for a spouse of a
7 member to have an official email address in order
8 to be apprised of what is going on particularly
9 with their spouses -- member spouses activity and
10 calendar.

11 MS. BENITEZ: Okay.

12 With that in mind, do the daily reports
13 have anything to do with Representative Lamborn's
14 calendar?

15 WITNESS 3: Maybe you could be more
16 specific. I'm not tracking with you. I don't
17 keep the calendar, so I'm not sure what you're
18 describing or asking.

19 MS. BENITEZ: Are the daily reports that
20 staffers send in on a daily basis, are those
21 reports -- let me rephrase.

22 What goes into the daily reports?

1 WITNESS 3: Okay. So I'm speaking for
2 myself because I don't know that there were ever
3 clear directions in giving them. I believe that
4 this is a tool to convey to my supervisors -- that
5 would include the Chief of Staff, who I rarely had
6 interaction with because he was in Washington,
7 D.C.; or the district director, who I had a little
8 bit more interaction with because they are here;
9 but then also to the Congressman; and then anyone
10 else who was interested -- to be able to say, Here
11 is who I'm meeting with, here is the activities
12 that I'm doing, here is how I'm managing the time.

13 I'm doing community outreach, so I say
14 this tongue in cheek to the staff all the time.
15 But I remind them, the only time I'm not doing my
16 job is when I'm in the office because I have been
17 hired to be out in the community. But as you can
18 imagine, when I'm out in the community, then my
19 supervisors might be wondering, What in the heck
20 is that guy doing.

21 So I see the daily report as an
22 opportunity to tell them, Here is what I'm doing,

1 here is the activities, and honestly, here is the
2 benefit that I'm bringing to our office.

3 MS. BENITEZ: So the daily reports are a
4 summary of what each staffer has done for that
5 day?

6 WITNESS 3: Well, yeah. That is a lot
7 easier way to put it. Thank you.

8 MS. BENITEZ: And so these -- the daily
9 reports have nothing to do with Representative
10 Lamborn's personal calendar?

11 WITNESS 3: Again, I'm not sure what
12 you're getting at. As far as his personal
13 calendar, what do you mean by that? What are you
14 asking exactly?

15 MS. BENITEZ: Whether or not what you are
16 reporting on in the daily reports has anything to
17 do with the Congressman's schedule, or any
18 meetings that he is attending, or any meeting that
19 is directly involving the Congressman having to
20 attend the function.

21 WITNESS 3: Only when I'm making those
22 recommendations. So as a communication tool, I

1 would say, met with so and so. Congressman, this
2 would really be a good outreach for your next
3 district work period.

4 That's -- I'm not sure what you are
5 getting at, but that is the only way I can see the
6 correlation.

7 MR. HARPER: And if I could -- Indhira, if
8 I could follow up on that on the calendar.

9 What is on the screen here, Witness 3,
10 that you have control of. Under the Pikes Peak
11 Regional Air Show, it says Updating Calendar
12 Event. In that particular instance that I am
13 referring to, do you see that?

14 WITNESS 3: I don't see that.

15 MR. HARPER: Okay. It is under one --

16 WITNESS 3: Oh, I do see it now. Thank
17 you.

18 MR. HARPER: The fourth bullet point says,
19 Updating Calendar Event. So are you aware that
20 the member, in this case Congressman Lamborn,
21 would have the ability to access everybody's
22 calendar to see what they have scheduled that day?

1 Or if the calendar event that was on there, could
2 see if it was something that he or she, the
3 member, in this case Congressman Lamborn, wanted
4 to do? Is that right?

5 WITNESS 3: Sure. That would make sense
6 to me.

7 MR. HARPER: That is it, Indhira. Thank
8 you.

9 MS. BENITEZ: Vane, thank you. You can go
10 ahead and take the exhibit off the screen.

11 Annie?

12 MS. CHO: Hi, Witness 3. To your
13 knowledge, do you know how Mrs. Lamborn accesses
14 her House email address?

15 WITNESS 3: You know, I really have no
16 idea.

17 MS. CHO: Okay. Thank you.

18 MS. BENITEZ: Witness 3, you mentioned a
19 couple minutes ago that Mrs. Lamborn has reached
20 out to you a sometimes for a favor involving Zoom
21 or help with something, and that you have received
22 these calls during work hours. There has been

1 times where you have received these calls during
2 work hours. Approximately, how often would you
3 say Mrs. Lamborn is reaching out for a personal
4 favor?

5 WITNESS 3: Here is what I would guess. I
6 would guess it would be a handful of times, five
7 times. Five or less times that I have been asked
8 to do a personal -- the other thing I want to
9 mention about that, is when the Congressman is
10 travelling, she's here alone. That is an example
11 I alluded to my wife and I going over there for
12 dinner. I think that was the first time that I
13 said, Look, with the Congressman being out of
14 town, if there is something that comes up, and you
15 are needing some help, I want to be available.

16 I really don't think she has called upon
17 that. I surely don't feel like she has taken
18 advantage of it. But that is what I offered as a
19 neighbor, as a friend, and I would appreciate that
20 for someone when I'm traveling. A lot of people
21 have done that for my family when I was away. So
22 five times, maybe at the max. Maybe she needed

1 some help lifting a furniture. If I was going to
2 give you my personal opinion, I kind of prefer to
3 take a break from my workday to do something like
4 that rather than if it was on a weekend or my day
5 off. To me, it didn't matter what time it was.
6 If I had a few minutes where I could take a break
7 and go do something personal to help, then that is
8 great.

9 MS. BENITEZ: And had she ever called you
10 for help with lifting furniture?

11 WITNESS 3: So moving furniture was on an
12 occasion of two, and then the Zoom thing that I
13 described.

14 MS. BENITEZ: How far is Mr. and Mrs.
15 Lamborn's home from the office?

16 WITNESS 3: I'm guessing two and a half
17 miles. From my house, probably a mile and a half.

18 MS. BENITEZ: And on the two occasions
19 where you went to help Mrs. Lamborn move
20 furniture, approximately how long did that take
21 you?

22 WITNESS 3: Ten minutes, maybe.

1 MS. BENITEZ: Is this something that you
2 have added in your daily reports when you step out
3 of the office?

4 WITNESS 3: No. It was a personal
5 activity. If you were to come back and show me,
6 Hey, here is a daily report you did, and you
7 turned it in.

8 Then that would have been a mistake, and I
9 would just acknowledge -- you know, that is not
10 something that I would report as part of my daily
11 activities.

12 MS. BENITEZ: Why not?

13 WITNESS 3: Because it was a personal
14 activity.

15 MS. BENITEZ: Is this something that other
16 staffers shouldn't be reporting?

17 WITNESS 3: You know what, I can't speak
18 toward other staffers as far as what they are
19 doing. And again, the purpose of that daily
20 report is a communication of, Hey, here is the
21 activities that are happening.

22 And if they have some reason to

1 communicating that to others, then it is not as if
2 it is -- what is the right thing? I don't know
3 what others should do. I'm just telling you where
4 I'm coming from on that.

5 MS. BENITEZ: So you don't know whether it
6 is a requirement or not.

7 WITNESS 3: It is definitely not a
8 requirement. Otherwise, I would have an email
9 that would tell me that I have to do this.

10 MS. BENITEZ: Do you know of any other
11 staffers that Mrs. Lamborn may have called if you
12 weren't available to help her with Zoom or
13 furniture or anything related?

14 WITNESS 3: You know what, I'm not sure of
15 that. Honestly, even if I helped, I would say to
16 the people in the office, Hey, I'm going to take a
17 break. I'll be back in half an hour.

18 It is not as if I went around telling them
19 that I was the favorite, and that I'm helping
20 Mrs. Lamborn. Nothing of that sort.

21 MS. BENITEZ: And to clarify, you
22 mentioned that Mrs. Lamborn has reached out to

1 you, you would say a total of about five times?

2 WITNESS 3: I think so, yeah. Maybe three
3 times for a Zoom, and maybe two times to move some
4 furniture.

5 MR. HARPER: And Witness 3, if I could
6 clarify, that is five times in the times that you
7 have worked there?

8 THE WITNESS: Yeah. Four and a half
9 years.

10 MS. BENITEZ: How are holidays in the
11 office? Do you and the other staffers buy gifts
12 for each other for Christmas, or birthdays?

13 WITNESS 3: We try to avoid the drama of
14 all of that. What we do instead is a gift
15 exchange. So at Christmas, we will often do a
16 gift exchange. For birthdays, people will get
17 together, and they will have a lunch, or they will
18 have a cake. Gifts just get so personal and
19 traumatic trying to figure out what you are going
20 to get for everybody.

21 MS. BENITEZ: What is involved in a gift
22 exchange?

1 WITNESS 3: So we will buy whatever gift
2 it is. It is wrapped, and people will come and
3 select --

4 MS. BENITEZ: White Elephant.

5 WITNESS 3: A very typical White Elephant.
6 That is correct.

7 MS. BENITEZ: How about for the
8 Congressman?

9 WITNESS 3: As far as -- rather than
10 everyone else trying to figure out what we are
11 going to do for the Congressman, if someone says,
12 Hey, we can combine, and here is an idea.

13 Then voluntarily, if we want to
14 participate in that, then we can. But there is no
15 pressure to participate in that.

16 MS. BENITEZ: Is this done for Christmas
17 and birthdays?

18 WITNESS 3: You know, it is not even that
19 structured. Certainly for Christmas, but I can't
20 think of anything for birthdays. That is pretty
21 much it. The only other holiday I can think of is
22 March Madness. We have a fun, pick the winners of

1 your bracket. But it is all very, very, casual.

2 MS. BENITEZ: Have you ever contributed to
3 a birthday gift for Representative Lamborn?

4 WITNESS 3: I believe I have.

5 MS. BENITEZ: Have you ever contributed a
6 gift for Mrs. Lamborn?

7 WITNESS 3: I don't think that I have.
8 Not that I can recall, no.

9 MS. BENITEZ: Have you ever participated
10 in a birthday celebration for the Congressman?

11 WITNESS 3: Yes. I have.

12 MS. BENITEZ: Have you ever participated
13 in one for Mrs. Lamborn?

14 WITNESS 3: I would say probably because
15 all of us, as far as us in the district office,
16 will, occasionally, get together for that kind of
17 celebration. I don't recall one specifically for
18 her. As a matter of fact, I can't even remember
19 when her birthday is. Can you help me as far as
20 remembering what time of year?

21 MS. BENITEZ: I actually don't know.

22 WITNESS 3: Then that is the best I can

1 do. Honestly, I think she gets embarrassed by
2 that kind of stuff, so I think -- I would be
3 surprised if we held one for her because she
4 doesn't like that kind of personal attention. But
5 then again, I wouldn't be surprised because we do
6 it for lots of people.

7 MS. BENITEZ: Annie?

8 MS. CHO: Witness 3, do you know who
9 initiates the process of getting the gift for
10 Representative Lamborn?

11 WITNESS 3: Do I know the process?

12 MS CHO: Yes. Who reaches out to the
13 staff and says, We should consider getting a gift
14 for the member.

15 WITNESS 3: The only one who is fresh in
16 my mind that I can think of is everyone was kind
17 of -- this would be my first year, that is why I
18 was paying closer attention to it. Asking, Hey,
19 what do we do?

20 Someone said, Rather than everyone
21 thinking through your own little thing --

22 You know, it can become sometimes a

1 contest -- I was coming new into the office, I
2 didn't know if it was like a 1-up of who is
3 getting the best gift.

4 They said, We avoid all that drama. We
5 would like to send the Congressman and
6 Mrs. Lamborn on a special dinner. If anyone would
7 like to contribute, you can do that.

8 That is what we did. I contributed \$10 or
9 something like that.

10 MS CHO: So who initiates that
11 conversation?

12 WITNESS 3: That conversation was led by
13 the district director. So Dale Anderson was the
14 one who -- as the district director at that point
15 just said -- you know what, in this part, it might
16 have been me initiating it at a staff meeting and
17 asking the question and saying, Hey, I'm the new
18 guy. What do we do for this?

19 And then they say, Okay. Here we are
20 going to do the gift exchange, and we are going to
21 combine together.

22 To say that Dale initiated it -- the

1 district director initiated it, he is the only one
2 who had a background to give me more information.
3 It could have been me initiating it, because I was
4 the new guy and wondering how these things work.

5 MS. CHO: Did anyone else express to you
6 not wanting to contribute?

7 WITNESS 3: If anyone wasn't able to
8 contribute or didn't want to contribute, no one
9 had to contribute.

10 MS. BENITEZ: Do you remember anyone vocal

11 --

12 WITNESS 3: Was there anyone specific
13 opting out? I know I opted out of at least one.
14 There was a staff pool where -- you know, there is
15 some staff pools for some other things. Sounds
16 silly, but right now we have a taco Tuesday pool.
17 Whoever has cash, throws it in. And I will
18 confess to you that I often opt out of that one.
19 But other opting out, I'm really not aware of.

20 MS. BENITEZ: Have you ever opted out of a
21 gift for the Congressman?

22 WITNESS 3: I don't believe I have. On

1 the other hand, I get absentminded, and I may have
2 missed it. You know what, I think one year I
3 wanted to contribute something. As a matter of
4 fact, I just wanted to contribute a little bit
5 more, and one of the district directors refused my
6 payment. So I may not have had a share in that
7 year. I'm sorry that I can't be more specific
8 about it because honestly, I just don't even think
9 about it. It is just not that big of a deal.

10 MS. BENITEZ: Did the district director or
11 Dale or anyone else for that matter ever plan to
12 gift any other staffer for their birthday? Kind
13 of how they did with Representative Lamborn.

14 WITNESS 3: Yeah. So there would be some
15 pools for things like that too, but it's just to
16 haphazard. It is not as if there is a big
17 structured plan. But yeah, people have pooled
18 together to do some other nice things for someone
19 on their birthday. They might have even got me a
20 -- you know, they don't pool for a gift. They
21 know my favorite thing is a cheesecake. They will
22 get together and do a cheesecake for me.

1 MS. BENITEZ: Have you ever participated
2 in a pool for a gift for another staffer?

3 WITNESS 3: I have. But I can't think of
4 what it is. Again, let me think of another staff
5 party that we did. You know, I can't think of it
6 right off the top of my head. I think that there
7 was a time that we wanted to do something special
8 for a former district director. Not sure why his
9 name just escaped my mind. But everyone wanted to
10 do something special. He had been under a lot of
11 the pressure, so we threw in money, got a lunch,
12 and got a cake, and had a gift. I definitely
13 remember doing that.

14 MS. BENITEZ: Were you ever present for
15 any celebrations for the Congressman's children or
16 extended family members?

17 WITNESS 3: Yeah. The one that I can
18 remember. It -- for instance, there was a
19 Christmas celebration that I was talking about.
20 It was off-site, off-hours, and the children
21 participated in that. I consider that a blessing
22 be able to get to know some of their out-of-town

1 children who I hadn't known.

2 There was another that was held at the
3 district office, I can't remember if it was even
4 planned any special way. But I know that the
5 Congressman's daughter-in-law and grandbaby was
6 there. So for me it was cool to get to know the
7 grandbaby a little bit.

8 MS. BENITEZ: Why was the daughter-in-law
9 there? Who was the celebration for?

10 WITNESS 3: You know, I think -- I don't
11 know if that was a birthday. I think we were also
12 happy that she had just gotten her citizenship, so
13 it was part of the birthday/citizenship/we're
14 getting to know you "party."

15 MS. BENITEZ: Are these parties common for
16 constituents? Do staffers throw parties when
17 other constituents become citizens or have
18 birthdays?

19 WITNESS 3: We had some significant
20 celebrations for other constituents who have
21 received citizenship, or a purple heart. Those
22 are more official. We just had a purple heart

1 celebration for a constituent. That was a big
2 deal for Carson. This one was more of a family,
3 personal interaction. So it certainly didn't come
4 to that level of the big deal that we make out of
5 some of the constituent acknowledgements.

6 MS. BENITEZ: So apart from
7 acknowledgements like the purple heart, has there
8 ever been a celebration at the office, or a party
9 for a constituent?

10 WITNESS 3: Sure. Work party is not the
11 right word. We have a congressional record that
12 we give them, so it is a formal occasion, pictures
13 are being taken. It is not a party like what
14 you're describing. The party that we are talking
15 about, there was no congressional record, there
16 was nothing official, there was no public
17 statement. It was just family members getting to
18 know staff members. In the same way that if my
19 child comes from college and is in town, she'll
20 stop by. And it is not an official party, but you
21 know, everyone is coming to the conference room.
22 And they are all interacting with someone who is

1 special to us because they are a family member of
2 our team.

3 MS. BENITEZ: And that kind of
4 celebration, is that something that is regularly
5 performed for other constituents?

6 WITNESS 3: I would consider that. For
7 sure, yeah.

8 So [REDACTED] Witness 4 [REDACTED] is in the office,
9 and she may have a sister that is coming by.
10 Everyone comes out and gets to know her and happy
11 to meet her sister. She brings her mom.

12 For me, if my children are coming out of
13 town, everyone is going to come by and say hi. Or
14 one time, you know, I had a special surprise with
15 a family member. They totally surprised me,
16 shocked me, and everyone just gathered around. It
17 was that kind of environment. It was festive,
18 nothing planned.

19 MS. BENITEZ: How many times has a
20 celebration like that happened for a constituent
21 that was not related to a staffer?

22 WITNESS 3: A handful.

1 MS. BENITEZ: And that no one had any
2 relation to?

3 WITNESS 3: If no one had any relation, a
4 handful. So again, we're going back to a purple
5 heart or --

6 MS. BENITEZ: No. No purple hearts or
7 certificates. Celebrations similar to the one you
8 are having with the Congressman's daughter-in-law
9 and for --

10 WITNESS 3: We would never do that because
11 it is not a professional -- this was a personal,
12 social group. We are far more careful and
13 professional if it is a constituent because you
14 set a precedent. You have to do one for every
15 constituent that comes in.

16 MS. BENITEZ: And going back, circling
17 back to -- we mentioned what your position was
18 currently in the Congressman's office, who do you
19 report to?

20 WITNESS 3: My direct report is to the
21 district office or to the district director.
22 Whoever that district director is. Currently,

1 that is to the Chief of Staff, who is Dale
2 Anderson.

3 MS. BENITEZ: Okay. Witness 3, I'm going
4 to hop off camera just to go over my notes really
5 quickly, so we can wrap up. I am going to make
6 sure that I have touched base on everything. So
7 you can take a break.

8 We can go off the record.

9 (Whereupon, a recess was taken.)

10 MS. BENITEZ: Okay. Just a couple of last
11 questions, and then we can wrap up.

12 Earlier you mentioned the daily reports
13 are meant for your supervisor to kind of keep
14 abreast of what you are doing to anyone who is
15 interested.

16 Do you consider Mrs. Lamborn your
17 supervisor?

18 WITNESS 3: Absolutely not. Definitely an
19 interested party.

20 MS. BENITEZ: Would staffers be allowed to
21 send the daily reports to constituents? For
22 example, if constituents called and asked and

1 wanted to know what was happening in the office.

2 WITNESS 3: You know what, I don't see any
3 prohibition toward that. I don't know any
4 prohibition of that. I haven't been instructed
5 that it is prohibited to convey it to staff or
6 other constituents. I know that I have shared
7 mine with other constituents. They will say, Hey,
8 what do you do?

9 So I would pull it out and say, Here are
10 the kinds of things that I'm involved in.

11 MS. BENITEZ: Annie, do you have any more
12 questions?

13 MS. CHO: No. I think I'm good.

14 MR. HARPER: Indhira, I didn't want to cut
15 you off. If you had other questions, I can wait.
16 I want to make sure you were -- to where I could
17 ask a couple follow-ups.

18 MS. BENITEZ: I do not have further
19 questions.

20 MR. HARPER: Witness 3, just a couple of
21 follow ups, if I may.

22 On the daily reports, as far as yours are

1 concerned, you might not be privy to all of them.

2 Do you ever put anything in there that is
3 confidential or discloses personal information on
4 anyone?

5 WITNESS 3: I can't think of any scenario
6 that it would be something confidential. I can't
7 think of any situation that I put something
8 confidential.

9 MR. HARPER: All right. As far as the
10 personal things on those five occasions that you
11 were asked to do personal things for Mrs. Lamborn,
12 none of that was ever done on official time;
13 right? You took a personal break or after work?
14 Would that be fair to say?

15 WITNESS 3: That is correct.

16 MR. HARPER: And then, one other question,
17 when it comes to Lamborn's daughter-in-law that
18 had gained her citizenship. I assume, most of the
19 time, when you have a constituent that goes
20 through the naturalization process, that is a
21 really big deal, is it not?

22 WITNESS 3: Yeah. We are happy for

1 everyone. I can't think of other scenarios, but
2 we had other people who gain their citizenship,
3 and it is a happy occasion. In this case, this
4 was just family celebration, man. From my
5 perspective, I can't really remember if it was
6 more of a birthday event, or if was a come up, her
7 naturalization, or her citizenship. It felt like
8 more of a family birthday party to me than
9 anything.

10 MR. HARPER: So a lot of happy folks at
11 that one.

12 WITNESS 3: For sure. We were more happy
13 about the grandbaby that was there. We all got to
14 interact with the grandchild that was there. It
15 was a lot of fun.

16 MR. HARPER: And it is not unusual for
17 staff, like you said whether it is a child of
18 yours or somebody related to one of the other
19 staffers to come by and say hello. That is not an
20 unusual occurrence; correct?

21 WITNESS 3: That is correct. It is not
22 unusual.

1 MR. HARPER: All right. And when you did
2 a naturalization process, I assume that
3 Congressman Lamborn would do a certificate of
4 congratulations on that on occasion that would go
5 to those constituents?

6 WITNESS 3: So if it was a more formal
7 constituent thing, then it would be a
8 congressional record or a certificate or
9 something. To my knowledge, none of that was done
10 on this. This was truly a happy, family occasion.

11 MR. HARPER: So actually, in that case,
12 the daughter-in-law perhaps received less than
13 what someone else would receive in a formal
14 setting. Would that be proper?

15 WITNESS 3: That would be true. There was
16 certainly no documented -- I didn't know of any
17 kind of documented congressional record, and
18 usually, I am part of helping prepare those. We
19 have done a lot of congressional records, and may
20 or may not have been inappropriate for a
21 Congressman to do that for a family member, but
22 this was not that. This was just a happy, family

1 occasion. We were all there, had some cake. As I
2 recall, I think we ended up eating hot dogs and
3 apple pie. Something that was kind of an American
4 theme.

5 MR. HARPER: Thanks, Witness 3.

6 MR. HARPER: Indhira, that is all the
7 questions I have.

8 MS. BENITEZ: I do not have any.

9 Actually, one follow-up question on one of
10 Greg's questions for you.

11 When you performed these errands for
12 Mrs. Lamborn, she was calling you during work
13 hours; correct?

14 WITNESS 3: It depended. It wasn't always
15 during work hours.

16 MS. BENITEZ: Was it sometimes during work
17 hours?

18 WITNESS 3: So there was a couple of
19 occasions that it was during work hours. And then
20 there were a couple other occasion where it would
21 be on my day off or on a weekend or an evening.
22 It varied.

Transcript of Interview of Witness 3
Conducted on September 7, 2021

47

1 MS. BENITEZ: Out of those five times that
2 you mentioned where you helped with Zoom and
3 moving furniture, you stated that the two times
4 you helped with furniture, it was during the
5 workday and you would be happy to --

6 WITNESS 3: One was during the workday,
7 and one was on the day that I was off. One day, I
8 was off, and I was able to go in gym clothes. I
9 had just came from the gym, and so I had gym
10 clothes, and I could move some furniture for her.
11 The other time she needed some furniture moved, I
12 was dressed for work. I took a break from work.
13 I actually -- I mean, it was so light that I just
14 stayed in my work clothes and put something up on
15 a truck for her.

16 MRS. BENITEZ: And how about the other
17 three occasions?

18 WITNESS 3: For the Zoom, one, for sure,
19 would have been the evening when she was trying to
20 set something up on an evening call.

21 One, for sure, she came to the office,
22 which I was grateful for because it saved me a

1 trip of going somewhere else. She said, Hey, I
2 need some help for Zoom. Can I stop by the office
3 for convenience for you?

4 So that is one that was definitely during
5 the workday. And then the other, I can't even --
6 those are the only four occasions that I can
7 really remember.

8 MS. BENITEZ: I have no further questions.
9 We can go ahead and hop off the record.

10 (Off the record at 12:22 p.m.)
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EXHIBIT 4

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Witness 2

Review No. 21-4329
August 31, 2021

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OCE Matter (21 4329)

Interview of WITNESS 2

Conducted Virtually

Tuesday, August 31, 2021

3:31 p.m. EST

Job No.: 396361

Pages: 1 60

Reported By: Brendan Cuenca

Transcript of Interview of Witness 2
Conducted on August 31, 2021

1. Deposition of WITNESS 2, conducted virtually:

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8. Pursuant to notice, before Brendon Cuenca,

9. Notary Public in and for the State of Maryland.

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Transcript of Interview of Witness 2
Conducted on August 31, 2021

3

1 A P P E A R A N C E S

2 ON BEHALF OF WITNESS 2:

3 GREGG HARPER, ESQUIRE

4 WATKINS & EAGER, PLLC

5 The Emporium Building

6 400 East Capitol Street

7 Jackson, MS 39201

8 (601) 965 1900

9

10 ON BEHALF OF THE OFFICE OF CONGRESSIONAL ETHICS:

11 INDHIRA BENITEZ, ESQUIRE

12 OMAR ASHMAWY, ESQUIRE

13 ANNIE CHO, ESQUIRE

14 OFFICE OF CONGRESSIONAL ETHICS OF THE U.S.

15 HOUSE OF REPRESENTATIVES (OCE)

16 425 3rd Street, S.W.

17 Suite 1110

18 Washington, DC 20024

19 202.225.9739

20

21 ALSO PRESENT:

22 Dylan Keisler, remote technician

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21-4329_0170

Transcript of Interview of Witness 2
Conducted on August 31, 2021

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C O N T E N T S

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(Retained by counsel.)

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Transcript of Interview of Witness 2
Conducted on August 31, 2021

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P R O C E E D I N G S

WHEREUPON,

WITNESS 2

of lawful age, being by me first duly sworn to
testify the truth, the whole truth, and nothing, but
the truth, as herein certified, deposes and says as
follows:

EXAMINATION BY COUNSEL FOR OCE

BY MS. BENITEZ:

05:29:30
05:29:30
05:32:13
05:32:16
05:32:17
05:32:22
05:32:24
05:32:25
05:32:28
05:32:36
05:32:38
05:32:41
05:32:45
05:32:48

Ms. Benitez: Today is August 31, 2021. We
are conducting the virtual interview of WITNESS 2.
Witness 2 is represented by counsel, Greg Harper,
who is also present today. Speaking is Indhira
Benitez. I am an investigative counsel with the
Office of Congressional Ethics. Joining me today
are my colleagues, Omar Ashmawy, and Annie Cho.

Witness 2 has been given a copy of 18
USC1001, and she has signed and acknowledged a
receipt and also returned that back to our office.

Q So **Witness 2** please at any time feel free to
stop me and ask me if you need a break or you have
any questions.

Transcript of Interview of Witness 2
Conducted on August 31, 2021

6

1 A Thank you. 05:32:48

2 Q Thank you. Thank you actually for taking 05:32:49

3 time out of your day to sit with us. In an effort 05:32:51

4 to make this as quick as possible, let's just jump 05:32:54

5 right into it. 05:32:56

6 **Witness** how long have you been working for 05:32:57

7 Representative Lamborn? 05:33:00

8 A I began working for Representative Lamborn 05:33:01

9 in February of 2014. 05:33:06

10 Q And what was your first position, or your 05:33:09

11 first job with the Congressman? 05:33:17

12 A Senior caseworker. 05:33:19

13 Q And is that your current position with him? 05:33:20

14 A Yes. 05:33:23

15 Q How did you meet Representative Lamborn? 05:33:23

16 A Well, I met Representative Lamborn during my 05:33:29

17 interview, my job interview, which took place in 05:33:34

18 Indianapolis, and that's the first time I had met 05:33:40

19 him. 05:33:44

20 Q Are you originally from Indianapolis? 05:33:44

21 A Yes. 05:33:47

22 Q And you mentioned you're a senior 05:33:47

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21-4329_0173

Transcript of Interview of Witness 2
Conducted on August 31, 2021

7

1	caseworker?	05:33:50
2	A Uh huh.	05:33:51
3	Q What are some of your duties as senior	05:33:51
4	caseworker?	05:33:54
5	A Well, I work on a lot of cases. The	05:33:54
6	majority of my work is constituent services, so I	05:34:01
7	handle a lot of different Federal agency issues for	05:34:10
8	folks; but apart from that I also coordinate the	05:34:12
9	Congressman's Academy nomination process, and	05:34:16
10	previously I also coordinated the Congressional Art	05:34:23
11	Competition event for him, so that's mostly what my	05:34:27
12	job description entails.	05:34:31
13	Q And who do you report to?	05:34:33
14	A I would report to my most closest	05:34:37
15	supervisor, which would be our District director.	05:34:47
16	Q And who is the current District director?	05:34:49
17	A Currently the District director position is	05:34:51
18	not filled, and so therefore I am reporting directly	05:34:54
19	to our Chief of Staff.	05:34:57
20	Q Is that a recent development, that you	05:34:59
21	didn't have a District director?	05:35:05
22	A Yes.	05:35:07

Transcript of Interview of Witness 2
Conducted on August 31, 2021

8

1	Q Who was the prior District director?	05:35:08
2	A Mr. Norm Steen.	05:35:09
3	Q So when Norm was in the office, you would	05:35:15
4	report directly to Norm?	05:35:18
5	A Correct.	05:35:20
6	Q And how would you describe your relationship	05:35:21
7	with Representative Lamborn today?	05:35:23
8	A I have a very good relationship with	05:35:26
9	Congressman Lamborn. I very much am proud to work	05:35:29
10	for him. I'm proud to help him serve the	05:35:34
11	constituents of the Fifth District. I love	05:35:38
12	Colorado, so I feel blessed all the way around.	05:35:43
13	Q And have you had a chance to meet the	05:35:46
14	Congressman's family?	05:35:49
15	A I have met his family, yes, on a few	05:35:51
16	occasions.	05:35:55
17	Q How often do you interact with the members	05:35:56
18	of the family?	05:36:01
19	A Well, I would say very rarely have I	05:36:01
20	interacted with members of his family, apart from	05:36:05
21	his wife, Jeanie, who I see more often obviously	05:36:09
22	than I would his children, so.	05:36:14

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21-4329_0175

Transcript of Interview of Witness 2
Conducted on August 31, 2021

9

1 Q How often would you say you see Mrs.
2 Lamborn? 05:36:16
05:36:20

3 A Really not that often. So occasionally she 05:36:21
4 might come into the office, but that's very 05:36:26
5 occasionally. Or I would see her, you know, during 05:36:30
6 staff gettogethers or if they've invited folks over 05:36:35
7 to their home. Times like that is when normally 05:36:42
8 I'll see Mrs. Lamborn. 05:36:45

9 Q Does Ms. Lamborn ever reach out to you at 05:36:47
10 the office to work on any campaign related 05:37:00
11 activities? 05:37:02

12 A Well, I would not say she reaches out to me 05:37:03
13 at the office here. If there is something, which 05:37:06
14 hasn't occurred that often, but if there is 05:37:08
15 something that she's asking me to do, she will 05:37:12
16 contact me in an evening or during a weekend or 05:37:15
17 something typically. 05:37:19

18 Q How often would you say she reaches out to 05:37:20
19 you during the evenings or weekends? 05:37:28

20 A Very rarely, rarely, yeah. 05:37:31

21 Q And what kind of things does she ask or 05:37:33
22 request of you when she gets in contact? 05:37:37

Transcript of Interview of Witness 2
Conducted on August 31, 2021

10

1 A So the only thing I've ever been asked to 05:37:39
2 do, and on a very occasional, very occasionally, is 05:37:43
3 when they are out of town, and I've been asked to 05:37:50
4 check on the campaign mailbox, PO box, so I would 05:37:56
5 gladly do that. It takes moments of time, not long 05:38:06
6 at all, and I would always do that either on my way 05:38:10
7 into the office, but normally I would take my lunch 05:38:13
8 hour and just swing by there to check the mailbox 05:38:17
9 during my lunch hours, so I've never yeah. 05:38:21
10 Q Okay. So Mrs. Lamborn would contact you 05:38:27
11 outside of work hours? 05:38:30
12 A Uh huh. 05:38:31
13 Q And ask you to stop by and check the 05:38:32
14 campaign mail or check personal mail? 05:38:37
15 A She would ask if I would mind or if I was 05:38:39
16 available, to help keep an eye on the Post Office box 05:38:43
17 while she was out of town. And I would say during 05:38:50
18 the time I've worked for them, which is going on my 05:38:55
19 eighth year, it's been a very, very few instances 05:39:01
20 where I've been asked to just keep an eye on the 05:39:06
21 mailbox. It's much different than my previous 05:39:09
22 member of Congress that I worked for. He was 05:39:13

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21-4329_0177

Transcript of Interview of Witness 2
Conducted on August 31, 2021

11

1 always I actually wore kind of two hats there. 05:39:16
2 So as far as being asked to do campaign related 05:39:23
3 tasks, I was very pleased when I began working for 05:39:27
4 Congressman Lamborn that that was something that was 05:39:33
5 very rare that was asked of me to do. 05:39:37
6 Q Since it was very rare, if you had to guess 05:39:39
7 or give an estimate of approximately how many times 05:39:46
8 Mrs. Lamborn reached out to you or the amount of 05:39:49
9 times that you went over to pick up mail, how many 05:39:52
10 times would you say? 05:39:55
11 A You know, over a span of nearly eight years, 05:39:56
12 I would estimate maybe two or three times a year 05:40:01
13 maybe, and so two or three times per year times, 05:40:14
14 let's say, seven isn't that many times at all, yeah. 05:40:22
15 Q And would Mrs. Lamborn ever reach out to you 05:40:34
16 during the workday for you to perform similar tasks 05:40:37
17 or personal errands? 05:40:40
18 A No. I've never been asked to do a personal 05:40:42
19 errand. 05:40:45
20 Q Have you ever been actually, has any 05:40:46
21 other staffer been asked by Mrs. Lamborn to pick up 05:40:51
22 the mail maybe if you were out that day or if you 05:40:56

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21-4329_0178

Transcript of Interview of Witness 2
Conducted on August 31, 2021

12

1 were unavailable? 05:41:00

2 A I'm not aware, and I don't know if she's 05:41:01

3 asked another staffer to do anything of that nature. 05:41:05

4 Q And would you say when you went and 05:41:11

5 performed these tasks for the Congressman or Mrs. 05:41:18

6 Lamborn, that was on the weekends? You said the 05:41:21

7 nights or weekends or your personal time? 05:41:23

8 A No. Typically I would check the Post Office 05:41:26

9 mailbox during my lunch hour, so I would leave my 05:41:32

10 desk here. I would pick up my lunch and then swing 05:41:38

11 through the Post Office, check the Post Office box, 05:41:45

12 and then finish out my lunch hour and then return to 05:41:48

13 the office. It was never during my official duties. 05:41:54

14 It was never brought up to the office. If there was 05:41:58

15 mail, it was left in my car. You know, I never 05:42:02

16 brought anything up to the office to open or look 05:42:06

17 through. I simply kept everything in my car, and 05:42:10

18 then if there was mail, I would open it when I got 05:42:15

19 home, and I have a little home office area that I, 05:42:19

20 you know, have at home; and if there was something 05:42:26

21 like a contribution, I would simply let her know. 05:42:28

22 The only time she really ever asked if I 05:42:34

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21-4329_0179

Transcript of Interview of Witness 2
Conducted on August 31, 2021

13

1 would mind doing that was if it was during key 05:42:37
2 48 hour reporting times where they needed to keep 05:42:44
3 track of money that might be coming in. I fully 05:42:47
4 understood that that was an important thing to do 05:42:50
5 because with my former member of Congress, I was his 05:42:53
6 campaign finance person, so I knew what 48 hour 05:42:59
7 reporting was and that it's important to keep track 05:43:08
8 of what's coming in so that you can report that 05:43:11
9 properly. So I never had any issue doing that, and 05:43:14
10 it was, as I said, very occasionally I was ever 05:43:17
11 asked if I was available to do that, so. 05:43:22
12 Q And just to clarify, if you had to guess, 05:43:26
13 you said it would be maybe two to three times a 05:43:30
14 year 05:43:32
15 A Maybe, yes. 05:43:32
16 Q that Mrs. Lamborn would reach out? 05:43:33
17 A Yeah. Not that often at all, no. 05:43:35
18 Q How often would Mrs. Lamborn visit the 05:43:38
19 office? 05:43:42
20 A Really not often. Not often enough. I 05:43:44
21 always enjoy seeing Mrs. Lamborn. She's a wonderful 05:43:48
22 woman, very kind, and I always enjoy having her come 05:43:54

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21-4329_0180

Transcript of Interview of Witness 2

Conducted on August 31, 2021

14

1 into the office to say hello. When she does, it's 05:43:57
2 to say hello, and so we're always very happy to see 05:44:01
3 her; but she really doesn't come in much at all. 05:44:04

4 She never really has, and so, you know, yeah. 05:44:09

5 Q So I want to shift gears very quickly and 05:44:24

6 touch on the Congressman's son, [REDACTED]? 05:44:29

7 A Uh huh. 05:44:33

8 Q When did you first meet [REDACTED]? 05:44:34

9 A I may have first met [REDACTED] back when I first 05:44:36

10 started for Congressman Lamborn, perhaps at a 05:44:39

11 Christmas party or something, but to be honest, I'm 05:44:51

12 not sure I could pick him out from a group. That's 05:44:53

13 how not very often I've met him. Very nice I can 05:45:00

14 recall, so. 05:45:08

15 Q Did you ever help [REDACTED] with the Federal job 05:45:39

16 hiring process? 05:45:43

17 A I did, yes. 05:45:44

18 Q And how so? 05:45:48

19 A Well, I had, luckily, already prepared 05:45:50

20 materials through my normal constituent services 05:45:53

21 work because we are often contacted by constituents 05:46:04

22 asking for help with how to navigate the Federal job 05:46:08

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21-4329_0181

Transcript of Interview of Witness 2
Conducted on August 31, 2021

15

1 process. So, you know, it begins with USAjobs.com 05:46:14
2 or gov. Well, from there it gets even more 05:46:25
3 complicated. And I had prepared a packet of things 05:46:28
4 that help folks with that whole process, so luckily 05:46:31
5 I had everything ready, and I simply said, hey, I've 05:46:36
6 got just the thing. And so I was very happy to 05:46:42
7 share that information, public information, that 05:46:45
8 anyone can find. And so I just simply compiled it 05:46:48
9 and had it ready for folks when they contacted our 05:46:52
10 office. 05:46:55

11 Q And how did you know that [REDACTED] needed help 05:46:56
12 with the Federal job hiring process? 05:47:00

13 A Well, I was Mrs. Lamborn asked if I would 05:47:04
14 mind sharing some of the information I had already 05:47:10
15 available for constituents to help navigate through 05:47:13
16 the Federal job process. And, of course, I was 05:47:19
17 absolutely happy to do so. I had everything ready. 05:47:24
18 I said here you go. This is information that may be 05:47:29
19 helpful to you. I never was I never wrote a 05:47:33
20 resume. I never did anything further than just 05:47:38
21 providing, you know, Federal job process and tips 05:47:43
22 involving that. I wasn't asked to do anything more 05:47:50

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21-4329_0182

Transcript of Interview of Witness 2
Conducted on August 31, 2021

16

1 than that, and that's all that happened there. 05:47:58

2 Q You mentioned that Mrs. Lamborn very rarely 05:48:04

3 reached out to you to perform any of the campaign 05:48:11

4 work or really at all to perform anything outside of 05:48:13

5 your normal duties? 05:48:19

6 A Right. 05:48:20

7 Q So is this one of the times that she reached 05:48:20

8 out for a personal errand regarding her son? 05:48:23

9 A Well, I didn't see it as a personal errand. 05:48:26

10 I saw it as constituent services. This was the only 05:48:29

11 time, though, that she asked me if there was 05:48:38

12 information I could provide for a family member. 05:48:41

13 You know, yes, that was a first and only time that 05:48:48

14 she asked if I had information, and I knew it would 05:48:51

15 be for her son [REDACTED] for the job process, so, yes. 05:48:54

16 Q How did you know it would be for [REDACTED]? 05:49:00

17 A Well, she told me. 05:49:03

18 Q Okay. 05:49:06

19 A She told me, yeah. 05:49:06

20 Q So she said could you please provide some 05:49:09

21 information to my son or my family member? 05:49:12

22 A She said would you mind or would you be able 05:49:16

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21-4329_0183

Transcript of Interview of Witness 2
Conducted on August 31, 2021

17

1 to provide any information to [REDACTED] regarding the 05:49:19
2 Federal job process through USA jobs, and I said 05:49:25
3 absolutely. I've already got a constituent resource 05:49:33
4 folder ready. I saw it as just helping another 05:49:38
5 constituent, frankly, that just happened to be [REDACTED] 05:49:43
6 [REDACTED], and I was happy to do it because I myself 05:49:47
7 have been through the Federal job process, and it 05:49:50
8 certainly is not an easy thing, so. 05:49:53

9 Q And did Mrs. Lamborn when did she reach 05:49:58
10 out to you to ask you if you could provide that 05:50:04
11 information to [REDACTED]? 05:50:08

12 A I really don't know. I can't tell you when 05:50:09
13 exactly. I'm sorry. I can't recall the month or 05:50:14
14 when specifically that was. 05:50:20

15 Q Did you ever communicate directly with [REDACTED] 05:50:23
16 in helping explain the paperwork and the process? 05:50:26

17 A I think I did, yes. I think I emailed him 05:50:30
18 any documents that I thought may have been helpful 05:50:35
19 to him for that. 05:50:38

20 Ms. Benitez: Dylan, if you don't mind, 05:50:54
21 could you pull up Tab 2, and mark that as Exhibit A. 05:50:57

22 Technician: Absolutely. Please stand by. 05:51:14

Transcript of Interview of Witness 2
Conducted on August 31, 2021

18

1 (WITNESS 2 Deposition Exhibit A marked
2 for identification and retained by counsel.) 05:51:21
3 Ms. Benitez: And, Dylan, do I have control 05:51:21
4 of the screen? 05:51:24
5 Technician: Yes, I can give you control. 05:51:25
6 Just give me one moment. You should have control 05:51:29
7 now. 05:51:31
8 Q So **Witness 2** I believe this spans from Page 31 05:51:42
9 until 122. You don't have to go through every page. 05:51:51
10 You can scroll down a couple of pages, and let me 05:51:56
11 know if this looks like the information that you 05:51:59
12 sent over to ? 05:52:01
13 A So can I move it myself? 05:52:06
14 Q Oh, yes, I'm sorry. 05:52:10
15 Ms. Benitez: Dylan, could you please give 05:52:12
16 **Witne** control of the screen? 05:52:14
17 Technician: Yes, you should have it now. 05:52:20
18 A This looks like standard job tips that would 05:52:24
19 be available to everyone. I'm not sure if I 05:52:47
20 provided that, but it looks like a very nice, 05:52:55
21 comprehensive guide. 05:53:02
22 Q So you don't recall whether this is the 05:53:05

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21-4329_0185

Transcript of Interview of Witness 2
Conducted on August 31, 2021

19

1 information that you provided to [REDACTED]? 05:53:08

2 A Yeah, actually I'm not sure if this is it. 05:53:11

3 It may be. I haven't reviewed that actually, but 05:53:15

4 this looks like, you know, something that I would 05:53:24

5 actually, I'd like to save it to my desktop so that 05:53:34

6 I can send it to constituents. It looks good. 05:53:38

7 Q And how often would you say you help 05:53:42

8 constituents with the Federal job hiring process? 05:53:45

9 A You know, not that often but often enough 05:53:47

10 that I had gathered some things, and then I think 05:53:52

11 that during my Federal job search, I had acquired a 05:53:58

12 couple of things or tips that I just remembered, you 05:54:06

13 know, that I could share. For instance, well, I've 05:54:12

14 been told that you need to use buzzwords from the 05:54:16

15 job description and put into a resume, things like 05:54:22

16 that. That's about as deep as it would get of 05:54:32

17 things that I would share with folks, but I would 05:54:35

18 have to look back to see exactly. This looks like a 05:54:37

19 standard, nice, comprehensive packet for folks. 05:54:40

20 Q And to clarify, you don't recall if this is 05:54:47

21 the one that you sent [REDACTED]? 05:54:51

22 A Correct. 05:54:53

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21-4329_0186

Transcript of Interview of Witness 2
Conducted on August 31, 2021

20

1 Q And have you ever sent anything like this to 05:54:54
2 any other constituents? 05:54:56

3 A I think possibly something similar to this, 05:54:58
4 yes, but I don't know if it was issued by the 05:55:02
5 Department of Labor or not, which I think I saw that 05:55:05
6 it was, yeah. 05:55:07

7 Q And 05:55:08

8 A It's possible I did, but I'm not completely 05:55:11
9 sure. 05:55:15

10 Q And you mentioned that you did communicate 05:55:17
11 directly with [REDACTED] at some point; that you may have 05:55:20
12 emailed him some similar information? 05:55:23

13 A Uh huh, right. 05:55:26

14 Q Would you be able to provide those emails to 05:55:29
15 us? 05:55:31

16 A I can look, yes, and see what I have. I 05:55:31
17 haven't looked thus far, so yes. 05:55:35

18 Ms. Benitez: Dylan, you can go ahead and 05:55:45
19 take Exhibit A off the screen. Thank you. 05:55:48

20 Q So going back to, I guess, your duties in 05:55:51
21 the office as a senior caseworker, are you familiar 05:55:57
22 with daily reports? 05:56:00

Transcript of Interview of Witness 2
Conducted on August 31, 2021

21

1	A Yes.	05:56:03
2	Q What are daily reports?	05:56:05
3	A Daily reports are something that we are	05:56:07
4	asked to put together on a daily basis, just a quick	05:56:11
5	synopsis of things that we've accomplished for that	05:56:19
6	day. And then those are all compiled and shared	05:56:22
7	with the entire staff and the Congressman on a daily	05:56:26
8	basis.	05:56:35
9	Q And all staffers put together these daily	05:56:35
10	reports?	05:56:42
11	A Uh huh.	05:56:43
12	Q And how does the reporting work? Do you	05:56:43
13	send your report individually to one person, or is	05:56:46
14	that something that goes around the office?	05:56:49
15	A Yes. There is one person that's designated	05:56:50
16	for each office. We send our daily reports to them,	05:56:54
17	and then they compile them into one email document	05:56:59
18	and then send them out. So someone from our	05:57:03
19	Washington office will do that, and someone from our	05:57:08
20	District office will do that.	05:57:10
21	Q And do you remember is it the same person	05:57:12
22	that compiles everyone's daily reports and passes	05:57:17

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21-4329_0188

Transcript of Interview of Witness 2
Conducted on August 31, 2021

22

1 them along, or did that vary? 05:57:20

2 A Most usually. If the one person isn't 05:57:22

3 available, then someone else will do that, but 05:57:27

4 typically it's one person for each office. 05:57:32

5 Q And who do you remember do you know who 05:57:34

6 the individual responsible for that was at the 05:57:39

7 District office? 05:57:43

8 A Currently or in the past? There have been 05:57:44

9 several people over time. 05:57:48

10 Q Currently. 05:57:50

11 A Currently the person that's handling that 05:57:52

12 for our District office is Kathleen Clayton. 05:57:55

13 Q And was there a certain time of day where 05:58:00

14 you needed to send this information to Kathleen, or 05:58:03

15 could it be done 05:58:06

16 A Yes, we typically were asked to turn in 05:58:08

17 those reports by, you know, definitely before five 05:58:11

18 p.m., preferably sometime in the early to late 05:58:16

19 afternoon, but those needed to be issued before 5:00 05:58:22

20 typically. 05:58:27

21 Q And you mentioned the daily reports, they're 05:58:28

22 a summary of your day? 05:58:32

Transcript of Interview of Witness 2
Conducted on August 31, 2021

23

1	A Correct.	05:58:34
2	Ms. Benitez: Dylan, could you pull up Tab 1	05:58:39
3	and mark that as Exhibit B please.	05:58:42
4	(WITNESS 2 Deposition Exhibit B marked	
5	for identification and retained by counsel.)	05:59:01
6	Q So Witness 2 there aren't many pages in this	05:59:01
7	exhibit. I'll just have you kind of scroll through	05:59:05
8	and let me know when you're done.	05:59:10
9	A Sure.	05:59:12
10	Ms. Benitez: I'm sorry, Dylan. Could you	05:59:15
11	please give Witness 2 control of the document?	05:59:22
12	A Okay.	05:59:52
13	Q So Witness 2 are these the daily reports that	05:59:53
14	you described?	05:59:58
15	A Yes.	05:59:58
16	Q So it's mainly just bullet points	05:59:58
17	summarizing everyone's day all in one email?	06:00:03
18	A Yes.	06:00:06
19	Ms. Benitez: Dylan, do you mind giving me	06:00:08
20	control of the screen?	06:00:11
21	Technician: Yes. Give me just one second.	06:00:14
22	You should have control now.	06:00:19

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21-4329_0190

Transcript of Interview of Witness 2
Conducted on August 31, 2021

24

1	Ms. Benitez: Thank you, Dylan.	06:00:22
2	Q So I just want to point out a few things in	06:00:24
3	these daily reports. So July 3, 2019, this looks	06:00:29
4	like perhaps your daily report, and the highlighted	06:00:35
5	section here?	06:00:41
6	A Uh huh.	06:00:42
7	Q What is that referring to?	06:00:43
8	A So that's an example of one of the times	06:00:45
9	that I would check on the mail, the campaign Post	06:00:51
10	Office box mail; and as I told you earlier, I	06:00:57
11	typically did that during my lunch hour. And that's	06:01:01
12	just me chronicling that as part of my daily.	06:01:07
13	Q So for the record, the highlighted portion	06:01:17
14	says: Ran unofficial errand during my lunch break?	06:01:20
15	A Correct.	06:01:24
16	Q And scrolling down through these other	06:01:25
17	dailies, is it safe to assume that the unofficial	06:01:28
18	errand during your lunch hour are all you picking up	06:01:32
19	mail?	06:01:35
20	A Yes, absolutely.	06:01:35
21	Q I just want to	06:01:37
22	A That's always what that is, yes.	06:01:41

Transcript of Interview of Witness 2
Conducted on August 31, 2021

25

1	Q I want to clarify because earlier you	06:01:43
2	mentioned that Mrs. Lamborn would reach out very	06:01:47
3	rarely; maybe two or three times a year, but in	06:01:50
4	scrolling here through just a few of these dailies,	06:01:54
5	we have more than two or three times of unofficial	06:01:57
6	errands	06:02:00
7	A Yes.	06:02:01
8	Q that occurred within the span of just a	06:02:02
9	couple of months.	06:02:05
10	A Yeah.	06:02:07
11	Q So I just want to clarify. Was Mrs. Lamborn	06:02:08
12	reaching out to you more frequently than just two or	06:02:13
13	three times a year to pick up mail for the campaign	06:02:16
14	or personal mail?	06:02:49
15	A Well, looking at these dailies, I think that	06:02:50
16	may have been one instance where perhaps I did that	06:02:57
17	task more than I normally would have. But on	06:03:00
18	average and overall, I feel as though I'm barely	06:03:02
19	asked to do much at all when it comes to picking up	06:03:06
20	mail at the Post Office.	06:03:13
21	If you'll scroll down, can I see what time	06:03:18
22	period that was?	06:03:21

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21-4329_0192

Transcript of Interview of Witness 2
Conducted on August 31, 2021

26

1 Q Sure. 06:03:24

2 Ms. Benitez: . Dylan, you can give Witne
2 06:03:26
3 control. 06:03:30

4 A I mean, this isn't something that I do on a 06:03:31

5 regular basis. Absolutely it's not, and it's so few 06:03:35

6 times I barely feel burdened or overwhelmed with 06:03:41

7 having this particular task asked of me, so we're 06:03:46

8 looking at September of 2019, September yeah, so 06:03:53

9 that was over a couple weeks' span, I think, unless 06:04:14

10 I'm wrong there. A couple weeks during September, 06:04:18

11 so I may have done it for a duration of two weeks, 06:04:24

12 but if that's the case, it rarely happens that way. 06:04:30

13 I might have to I might monitor for a week or so 06:04:33

14 but nothing 06:04:40

15 Mr. Harper: Can you scroll down; is that 06:04:44

16 the last data report, or is there more after that? 06:04:46

17 A Let's see. October 2020. 06:04:58

18 Mr. Harper: Okay. 06:05:02

19 A Yeah, October 2, 2020, and here we are 06:05:02

20 almost a year earlier, right, September 25, 2019. 06:05:10

21 Q So what made this time different where you 06:05:17

22 were doing it more often? 06:05:20

Transcript of Interview of Witness 2
Conducted on August 31, 2021

27

1 A Well, I would assume that it was because the 06:05:22
2 Congressman and Mrs. Lamborn were out of town 06:05:27
3 perhaps for an extended period of time, so I would 06:05:30
4 check every other day. I didn't even go every day 06:05:35
5 probably. You know, so September 24, 2019. Oh, 06:05:40
6 okay, yeah, September 24. Let's see. There's 06:05:50
7 another September 2019. Oh, that's a duplicate. 06:05:55
8 That looks like a duplicate one because it's a 06:06:01
9 September 19. September 19, that's also a duplicate 06:06:05
10 because there's only one daily per day, so it looks 06:06:14
11 like three of those are for the same date, September 06:06:19
12 19. 06:06:21
13 Q Okay. 06:06:24
14 Ms. Benitez: Dylan, do you mind giving me 06:06:27
15 control of the screen again? 06:06:30
16 Technician: Absolutely. Just give me one 06:06:32
17 moment. Okay. You have control. 06:06:35
18 Q Thank you. And for each of these times 06:06:41
19 where you ran an unofficial errand during your lunch 06:06:52
20 break, was Mrs. Lamborn reaching out to you 06:06:56
21 contemporaneously as you were running the errand? 06:06:59
22 A No, not at all. 06:07:03

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21-4329_0194

Transcript of Interview of Witness 2
Conducted on August 31, 2021

28

1 Q How did that work? 06:07:05

2 A So after I said that I was available to do 06:07:06

3 that and she never told me to do it, she always 06:07:11

4 asked me if I might be available to do that during 06:07:16

5 my free time, and, of course, I would say, of 06:07:18

6 course. So I would meet with her once before she 06:07:21

7 left town, and that was always, you know, usually 06:07:25

8 after work. I would meet with her. She would give 06:07:31

9 me the mailbox key, and then I wouldn't speak with 06:07:34

10 her unless I communicated to her that a significant 06:07:40

11 contribution came in, and that would be for 06:07:46

12 reporting purposes. But that would only be 06:07:48

13 occasionally, so I only contacted her if I felt she 06:07:52

14 needed to be alerted to something. 06:07:57

15 Q And where was the Post Office located in 06:08:00

16 relation to your office? 06:08:06

17 A Yeah. So the Post Office is located 06:08:07

18 probably a mile or two up the road from the office 06:08:10

19 here, yeah. 06:08:14

20 Ms. Benitez: Dylan, you can go ahead and 06:08:19

21 take Exhibit B off the screen. Oh, I'm sorry. 06:08:22

22 Annie has a question. 06:08:31

Transcript of Interview of Witness 2
Conducted on August 31, 2021

29

1 BY MS. CHO:

2 Q Liz, you mentioned that Mrs. Lamborn rarely 06:08:33

3 reaches out to you to conduct these, you know, 06:08:36

4 checking the mail. If you notice on the email 06:08:40

5 chain I don't know who has control now, Indhira? 06:08:44

6 Ms. Benitez: I believe so. 06:08:51

7 Q If you could scroll down to the next email 06:08:53

8 thread, it looks like these daily reports are going 06:08:56

9 to Mrs. Lamborn as well. Do you have an explanation 06:08:58

10 as to why she's receiving these daily reports from 06:09:03

11 the staff? 06:09:06

12 A I don't, other than I would think it would 06:09:09

13 be not out of the ordinary that not only the 06:09:16

14 Congressman is aware of what the staff is doing but 06:09:20

15 Mrs. Lamborn. 06:09:25

16 Q So was she usually involved with staff on a 06:09:29

17 regular basis? 06:09:35

18 A I wouldn't say that, no. I never really 06:09:36

19 thought about that, so I don't see any issue with 06:09:39

20 Mrs. Lamborn being looped in on any daily reports or 06:09:43

21 anything like that. I believe her official email is 06:09:48

22 used for that. 06:09:55

Transcript of Interview of Witness 2
Conducted on August 31, 2021

30

1 Q Have you ever been directed to send your 06:09:56
2 daily reports to Mrs. Lamborn at all? 06:09:58
3 A No. 06:10:00
4 Ms. Cho: Thank you. 06:10:04
5 Mr. Harper: Could I interject? Which email 06:10:05
6 or daily report are we referring to that was sent? 06:10:08
7 Ms. Cho: If you scroll up, Indhira, if you 06:10:16
8 go to the one above it, if you look at the "to", 06:10:19
9 it's to Doug Lamborn and then Jeanie Lamborn. 06:10:23
10 Mr. Harper: All right. Any others of them? 06:10:27
11 Ms. Cho: If you scroll down more, that one 06:10:30
12 as well. 06:10:33
13 Mr. Harper: Is that the same one by chance? 06:10:34
14 Ms. Cho: It may be the duplicate. 06:10:37
15 Ms. Benitez: Let's see; that's September 18 06:10:41
16 to September 19, so two consecutive days in a row. 06:10:51
17 This is September 24, so it looks like Mrs. Lamborn 06:10:56
18 was receiving the daily reports every day that the 06:10:58
19 daily reports were going out. 06:11:01
20 Mr. Harper: Okay. Thanks. 06:11:04
21 Ms. Benitez: Thanks, Annie. Dylan, you can 06:11:17
22 go ahead and take Exhibit B off the screen: Oh, 06:11:20

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21-4329_0197

Transcript of Interview of Witness 2
Conducted on August 31, 2021

31

1	Omar has a question.	06:11:24
2	BY MR. ASHMAWY:	
3	Q This is Omar Ashmawy. I was just curious;	06:11:27
4	what email did you send the daily reports to, or	06:11:31
5	what email were the daily reports sent to when they	06:11:33
6	were sent to Mrs. Lamborn?	06:11:36
7	A Well, it depends on which staffer in the	06:11:39
8	office is assigned the job of compiling all of the	06:11:42
9	staff's daily reports. The ones we were looking at,	06:11:50
10	it looks like at the time the staffer was Linda	06:11:53
11	Rutzen.	06:11:56
12	Q To be clear, you just said in response to a	06:11:59
13	question by Ms. Cho was that the daily report was	06:12:02
14	sent to Mrs. Lamborn's official email, so I was just	06:12:05
15	wondering, does she have a mail.house.gov email that	06:12:09
16	she sent these to?	06:12:17
17	A I think so. I believe she does.	06:12:18
18	Q Does she have a title with the Congressional	06:12:20
19	office?	06:12:22
20	A No, not that I'm aware of.	06:12:23
21	Q Does she get paid by the Congressional	06:12:24
22	office as far as you're aware?	06:12:27

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21-4329_0198

Transcript of Interview of Witness 2
Conducted on August 31, 2021

32

1 A No, not that I'm aware of, no. 06:12:28

2 Q Is she an employee of the House of 06:12:30

3 Representatives, as far as you're aware? 06:12:34

4 A No. 06:12:37

5 Mr. Ashmawy: That's all I have. 06:12:41

6 BY MS. BENITEZ: 06:12:46

7 Q [Witness 2] circling back to the request by Mrs. 06:12:46

8 Lamborn to help [redacted] out with the Federal job hiring 06:12:52

9 process, I just want to ask a couple more questions 06:12:55

10 about that. How often did you or how many times 06:12:58

11 did you say you interacted with [redacted] in that 06:13:05

12 process? 06:13:07

13 A Maybe two times; maybe two times. I think 06:13:08

14 once he came into the office to say hi to folks, and 06:13:20

15 then the other time would have been via email. 06:13:29

16 Q And you mentioned earlier sorry. Omar? 06:13:33

17 Mr. Ashmawy: You can finish up your 06:13:42

18 questions. I just have a question on this topic 06:13:44

19 also. 06:13:47

20 Q You mentioned earlier that Mrs. Lamborn 06:13:48

21 rarely comes into the office. How often would you 06:13:50

22 say you've seen Mrs. Lamborn in the office? 06:13:53

Transcript of Interview of Witness 2
Conducted on August 31, 2021

33

1 A Do you mean like just an estimated number of 06:13:55
2 times per month or per year? 06:13:58

3 Q Per month. 06:14:05

4 A Some months, none at all. I mean, it's not 06:14:06
5 a regular thing for Mrs. Lamborn to come into the 06:14:12
6 office, so. 06:14:16

7 Q Do you know if the Congressman spends much 06:14:17
8 time in the office? 06:14:21

9 A As with my former member of Congress that I 06:14:24
10 worked for, they don't I mean, no, he doesn't 06:14:29
11 spend an exorbitant amount of time in the office. 06:14:34
12 It depends on what's going on though because 06:14:37
13 sometimes the Congressman comes in quite often to do 06:14:40
14 interviews, or he conducts press out of our office; 06:14:45
15 or since the pandemic, we've been doing lots of Zoom 06:14:54
16 out of the office, so the Congressman has been in 06:14:58
17 much more than pre pandemic times. 06:15:00

18 Ms. Benitez: Omar. 06:15:07

19 BY MR. ASHMAWY:

20 Q Witness 2, you said that you viewed your 06:15:15
21 assistance with Mr. Lamborn's son as something you 06:15:18
22 would do for any constituent; correct? 06:15:20

Transcript of Interview of Witness 2
Conducted on August 31, 2021

34

1	A Right, yes.	06:15:22
2	Q Can I ask a question, just generally	06:15:25
3	speaking, in the time that you how many times did	06:15:28
4	you say well, how long have you been with Mr.	06:15:31
5	Lamborn?	06:15:34
6	A Going on eight years.	06:15:34
7	Q Eight years. In eight years, how many times	06:15:36
8	do you think you've assisted a constituent with a	06:15:39
9	job search?	06:15:45
10	A I would say probably less than a dozen	06:15:46
11	times. Not that often.	06:15:49
12	Q And when you've done it, would you review	06:15:54
13	the constituent's resume?	06:15:57
14	A No, nothing like that.	06:16:02
15	Q Would you go through specific job	06:16:03
16	opportunities with them to see if they should apply?	06:16:05
17	A No.	06:16:09
18	Q Would you assist them in preparing for	06:16:10
19	interviews?	06:16:12
20	A No.	06:16:13
21	Q Do you think that doing any of those things	06:16:13
22	would be something that would be appropriate for you	06:16:18

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21-4329_0201

Transcript of Interview of Witness 2
Conducted on August 31, 2021

35

1 to do or that that's 06:16:20

2 A No, I do not think that that would be 06:16:23

3 appropriate for me to do. 06:16:26

4 Q Okay. 06:16:27

5 Mr. Ashmawy: That's all I had, Indhira. 06:16:29

6 Thank you very much. 06:16:33

7 BY MS. BENITEZ: 06:16:36

8 Q So circling back to some of the requests on 06:16:36

9 behalf of Mrs. Lamborn, were there any other, it 06:16:39

10 seems like she reached out fairly at least 06:16:45

11 frequently in regard to campaign mail and reached 06:16:48

12 out that other time for some help with [REDACTED]'s 06:16:53

13 Federal application process. Were there any other 06:16:56

14 instances where Mrs. Lamborn was reaching out to you 06:17:00

15 for any similar requests? 06:17:07

16 A There have been a couple of times that 06:17:10

17 during election season, you know, we would be eager 06:17:12

18 to assist with yard sign placement, things like 06:17:22

19 that, you know, attend on what's the word you 06:17:32

20 know, to be active with the election process as far 06:17:45

21 as going to delegate meetings and things like that; 06:17:49

22 but that's normal as far as I know, as far as my 06:17:52

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21-4329_0202

Transcript of Interview of Witness 2
Conducted on August 31, 2021

36

1 time in working for a member of Congress, staff is 06:17:58
2 always very much interested in the political process 06:18:03
3 and wants to participate. So I would always 06:18:06
4 volunteer my time on weekends to help distribute 06:18:11
5 yard signs. I always enjoyed it. It was not 06:18:16
6 something that I felt like I was required to do at 06:18:19
7 all, but I was always happy to do that, so I have 06:18:21
8 done that a handful of times over the years, not 06:18:24
9 always. Because sometimes I just, you know, my back 06:18:27
10 hurts or whatever; but when I'm able, I always do 06:18:32
11 volunteer to help with that. 06:18:37
12 Q What about any other events, maybe family 06:18:39
13 events, birthdays or other celebrations? 06:18:45
14 A No, but we do always enjoy the annual 06:18:50
15 Christmas gettogether, so that's something that we 06:18:54
16 all well, I can say I look forward to attending 06:19:01
17 every year, and usually the Lamborns invite family 06:19:04
18 and friends and staff, and so that's always a very 06:19:09
19 happy time to get together. 06:19:13
20 Q And were you involved at all in any birthday 06:19:16
21 celebrations for the Congressman? 06:19:24
22 A Well, we would always want to have little 06:19:27

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21-4329_0203

Transcript of Interview of Witness 2
Conducted on August 31, 2021

37

1 parties for the Congressman for his birthday, and 06:19:32
2 sometimes we would just get together at the office 06:19:38
3 and, you know, have cake and ice cream and just chit 06:19:41
4 chat about things that are going on; so, yeah, we 06:19:49
5 would gather as a staff and get together for the 06:19:54
6 Congressman and Mrs. Lamborn for birthdays. And we 06:19:57
7 would also do that for every staffer, so it can be 06:20:02
8 quite a lot of cake. It helps to break the monotony 06:20:06
9 when you're working in a very stressful environment, 06:20:13
10 and it's nice to have that time out to get together 06:20:16
11 as a team, as a staff, with the Congressman or 06:20:18
12 without, to have those little time outs and parties, 06:20:26
13 yeah. 06:20:28
14 Q So would the staff also celebrate Mrs. 06:20:29
15 Lamborn's birthday? 06:20:35
16 A Of course, yeah. 06:20:36
17 Q How about other family members? 06:20:38
18 A No, not their extended family members, not 06:20:41
19 their children's birthdays or any of that, no. 06:20:48
20 Q Would you find it odd if you were taking 06:20:51
21 part in a birthday party for the Congressman's son 06:20:56
22 or one of his children? 06:21:00

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21-4329_0204

Transcript of Interview of Witness 2
Conducted on August 31, 2021

38

1 A Well, I mean, I don't know if I'd feel it 06:21:02
2 was odd. If the whole staff was invited and it was, 06:21:09
3 you know, fine. I wouldn't feel uncomfortable with 06:21:17
4 that at all. To my knowledge, I don't think there's 06:21:19
5 ever been a time when they invited staff to 06:21:22
6 something like that for their children, so. 06:21:24
7 Q What about a time where a similar event 06:21:27
8 maybe happened in the office? 06:21:30
9 A For their family? 06:21:32
10 Q Yes. 06:21:36
11 A No, I can't think of a time when that 06:21:38
12 occurred. 06:21:41
13 Q And if there was a celebration for a family 06:21:41
14 member that wasn't the Congressman or his wife, 06:21:46
15 would you find that odd if it was held in the 06:21:50
16 office? 06:21:52
17 A Well, yeah. I mean, not all our 06:21:54
18 gettogethers have been at the office. Sometimes 06:21:59
19 they have, and sometimes we've met outside the 06:22:04
20 office, so I mean, it's nothing that I would think 06:22:07
21 would be odd or out of the ordinary at all. 06:22:11
22 Q Did you ever meet the Congressman's 06:22:14

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21-4329_0205

Transcript of Interview of Witness 2
Conducted on August 31, 2021

39

1 daughter in law, Oksana? 06:22:19

2 A I think we actually did meet Oksana, yes. 06:22:22

3 Q And was there a celebration for her 06:22:25

4 naturalization in the office? 06:22:29

5 A Yes, there was. 06:22:31

6 Q And did you find the celebration odd? 06:22:32

7 A No, I did not, not at all. We were all very 06:22:36

8 pleased for Oksana. 06:22:43

9 Q So only I guess I just want to clarify; 06:22:45

10 had it been a birthday for Oksana, that would have 06:22:49

11 been strange? 06:22:52

12 A Yeah, I don't think that I mean, so the 06:22:53

13 Lamborns don't request that staff get together for 06:22:58

14 everybody's birthday, for their children's birthday. 06:23:04

15 We get together for each other, each other's 06:23:09

16 birthdays, everyone on staff, and the Congressman 06:23:13

17 and Mrs. Lamborn, and that's pretty much it. I 06:23:18

18 mean, that's it. And sometimes if a staffer in 06:23:21

19 Washington has a birthday, we're put on conference 06:23:27

20 call with the D.C. office and we all sing happy 06:23:31

21 birthday. So birthdays, we take a moment out during 06:23:37

22 our lunch and have cake and sing happy birthday, and 06:23:40

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21-4329_0206

Transcript of Interview of Witness 2
Conducted on August 31, 2021

40

1 then that's that. So it's a fun and nice break in 06:23:45
2 the pace of the busy day, and we're all happy to do 06:23:51
3 it, and that's all they do. I don't remember any 06:23:56
4 time where we had been asked or asked to attend a 06:23:59
5 birthday party for one of their children, no. 06:24:04
6 Q Do you know who planned the celebration for, 06:24:07
7 the party celebrating Oksana's naturalization? 06:24:16
8 A I do not know who planned that, no. 06:24:19
9 Q Where did that take place? 06:24:23
10 A In the office. I believe that occurred 06:24:24
11 after hours, after 5:00, I think, but I can't be for 06:24:34
12 certain. I do recall she came in. She did get her 06:29:42
13 citizenship. I know that I prepared a Certificate 06:29:46
14 of Recognition which congratulated her on her 06:29:56
15 citizenship. We have a supply of those certificates 06:29:59
16 here in the office for folks that, you know, have 06:30:02
17 that happen, so yeah. It was wonderful. 06:30:05
18 Q You said it happened after work hours? 06:30:09
19 A I believe so. 06:30:11
20 Q How did you know to attend? Who invited 06:30:13
21 you, I guess? 06:30:18
22 A Yeah, I can't recall. I can't recall who 06:30:19

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21-4329_0207

Transcript of Interview of Witness 2
Conducted on August 31, 2021

41

1 actually put together a staff, oh, let's get 06:30:22
2 together and congratulate Oksana. I don't know who 06:30:31
3 did that, no. 06:30:35

4 Q Did the Congressman or his wife ever 06:30:36
5 request, to your knowledge, any celebrations for 06:30:43
6 anything similar of that nature? 06:30:47

7 A I do not believe so, no, not that I can 06:30:50
8 recall. 06:30:59

9 Q You mentioned earlier that currently there's 06:30:59
10 no District director, but there was a District 06:31:05
11 director previously, and I'm sorry. Could you 06:31:09
12 remind me of his name again? 06:31:12

13 A Norm Steen. 06:31:14

14 Q Norm Steen. And was **Witness 1** ever your 06:31:17
15 District director? 06:31:23

16 A Yes. 06:31:24

17 Q And how long were you reporting to **Witness** 06:31:25
18 **██████**? 06:31:34

19 A I believe that he was the District director 06:31:34
20 for less than a year. It could have been a year and 06:31:40
21 a couple of months, but yeah. 06:31:45

22 Q And what was your relationship like with 06:31:49

Transcript of Interview of Witness 2
Conducted on August 31, 2021

42

1 **Witness** ? 06:31:53

2 A Pretty standard initially with **Wi Witness 1**, 06:31:54

3 standard relationship, businesslike, but that 06:32:15

4 changed over time. 06:33:20

5 Q How so? 06:33:23

6 A I had issues with **Wit Witness 1** and the way he 06:33:24

7 was managing the District office. 06:33:41

8 Q Was **Wit Witness 1** ever responsible for or 06:33:43

9 initiated buying gifts for birthdays or Christmases 06:33:49

10 for Representative Lamborn or Mrs. Lamborn? 06:33:54

11 A Yes, I think as the District director, they 06:33:57

12 typically would send out a notification that said, 06:34:03

13 hey, you know, we're thinking of getting a gift card 06:34:09

14 for the Congressman for his birthday. Can you chip 06:34:13

15 in 5, \$10, so that typically would fall to the 06:34:17

16 District director, uh huh. 06:34:24

17 Q Did you ever receive a request sorry. 06:34:27

18 Annie. 06:34:32

19 BY MS. CHO:

20 Q You mentioned earlier that the office 06:34:35

21 celebrated birthdays not just for the member or Mrs. 06:34:38

22 Lamborn, but for other staffers as well. Were there 06:34:46

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21-4329_0209

Transcript of Interview of Witness 2
Conducted on August 31, 2021

43

1 ever requests given by **Witness 1** or anyone else on 06:34:49
2 staff for gifts for other staffers as well for their 06:34:51
3 birthdays? 06:34:53

4 A Well, there are sometimes requests to do 06:34:55
5 things for people's birthdays, whether it be 06:34:59
6 sabotage spreading glitter and balloons and 06:35:12
7 moving furniture around in the person's office. I 06:35:16
8 mean, things like that would be requested, and we 06:35:20
9 would all jump in and wreak havoc in that person's 06:35:22
10 office so when they walked in on their birthday, 06:35:26
11 they walked into a complete mess, so those requests 06:35:30
12 were put out, yes. 06:35:33

13 Q But no requests for, hey, we're getting a 06:35:34
14 gift card for so and so? 06:35:37

15 A Well, yes, actually. So if we got cake and 06:35:39
16 ice cream or any supplies that we would want to have 06:35:45
17 for any staffer's birthday, we generally all chipped 06:35:49
18 in on the cost of that, yeah. We didn't let one 06:35:53
19 person carry the cost of all of those birthdays. 06:35:56

20 Q And how did those requests come to you? 06:35:59
21 Would it be just discussed in person? Would it be 06:36:02
22 an email requesting it? 06:36:05

Transcript of Interview of Witness 2
Conducted on August 31, 2021

44

1 A Mostly in person I would say, sometimes 06:36:08
2 maybe through email, but I think generally people 06:36:10
3 would go around and verbally talk about what we're 06:36:15
4 going to do and how we're going to pay for it and 06:36:18
5 things like that. So perhaps a mixture, but I think 06:36:22
6 probably mostly verbal. 06:36:25
7 Ms. Benitez: Omar. 06:36:38
8 BY MR. ASHMAWY:
9 Q I just wanted to clarify some of Ms. Cho's 06:36:41
10 questions. I understand that there was cake and 06:36:45
11 there was activities around parties, but did any 06:36:47
12 other staff members receive gifts? 06:36:49
13 A Yeah. I think not always and every time, 06:36:54
14 but sometimes, you know, coffee mugs, things like 06:36:58
15 that, but I think, I feel personally that we kind of 06:37:05
16 were under a general consensus that, oh, we don't 06:37:12
17 need to get a gift for everyone. Let's not go to 06:37:16
18 all that, but sometimes there were gifts for 06:37:19
19 staffers, yes, I think. 06:37:22
20 Q Just Mr. Lamborn and Mrs. Lamborn? 06:37:24
21 A Well, there may have been a gift for a 06:37:28
22 staffer here and there, but overall I think we were 06:37:34

Transcript of Interview of Witness 2
Conducted on August 31, 2021

45

1 happy to chip in for a gift card for the Congressman 06:37:37
2 or Mrs. Lamborn. 06:37:42
3 Q I totally understand that, but a gift for 06:37:43
4 Mr. Lamborn and Mrs. Lamborn was an annual thing; 06:37:46
5 correct? 06:37:50
6 A For the most part, but, again, we didn't 06:37:51
7 have to contribute, but it all still was given as 06:37:55
8 from the staff, a gift from the whole staff, so it 06:38:02
9 was a gift that was presented that not all of us 06:38:06
10 contributed, and we didn't have to contribute; but I 06:38:13
11 think people were happy to do so. I think that, you 06:38:16
12 know, it's a nice thing to do. 06:38:21
13 Q Were you aware of anyone who might not have 06:38:23
14 been happy to do so? 06:38:27
15 A I did hear a little pushback from Mr. 06:38:28
16 **Witness 5**, and at that time I remember speaking 06:38:34
17 to him. He was at his desk and he was like what, 06:38:39
18 you know, expressing the fact that he thought it was 06:38:53
19 BS that we have to contribute \$5 towards a group 06:38:55
20 gift, and I remember saying you don't have to 06:38:59
21 contribute anything. It's not a requirement, and 06:39:02
22 there was no auditing or reporting of who 06:39:06

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21-4329_0212

Transcript of Interview of Witness 2
Conducted on August 31, 2021

46

1 contributed, who didn't, so it's not like he had to. 06:39:13
2 But I do remember him speaking out against that. I 06:39:17
3 was like don't contribute then. You don't have to 06:39:20
4 contribute. 06:39:23
5 Q Was there anyone else that you were aware of 06:39:23
6 that was unhappy with this arrangement? 06:39:25
7 A No, \$5, no. 06:39:30
8 Q Are you familiar with the phrase "people 06:39:33
9 have been fired for less"? 06:39:35
10 A I believe I read that in the lawsuit that 06:39:39
11 was filed. 06:39:47
12 Q Did you ever hear those words in the office? 06:39:50
13 A I have not. 06:39:52
14 Mr. Harper: I'm going to, at this point 06:39:55
15 we're getting into things that could be a part of 06:39:58
16 the matter of the Complaint and Congressional 06:40:01
17 Accountability Act, so 06:40:05
18 Mr. Ashmawy: That's okay, Gregg. She 06:40:08
19 already answered the question, so thank you very 06:40:11
20 much. That's all I have, Indhira. 06:40:13
21 BY MS. BENITEZ: 06:40:18
22 Q You were saying when you were working under 06:40:18

Transcript of Interview of Witness 2
Conducted on August 31, 2021

47

1 **Witness 1** at some point there was a breakdown in 06:40:21
2 your professional relationship with him? 06:40:24
3 A Yes, that's right. 06:40:25
4 Q And why is that? 06:40:26
5 A **Wit Witness 1** became more and more 06:40:28
6 unprofessional, more and more erratic in his 06:40:33
7 behavior, and he made it extremely difficult for me 06:40:44
8 at one point, and I believe he did not have my best 06:40:54
9 interests, you know, in mind. 06:41:05
10 Q Could you give me a specific example? 06:41:08
11 A Yes. One example I can give you is when 06:41:11
12 during the COVID 19 time, when the virus was quite 06:41:21
13 prevalent, I was quite diligent in wearing my mask 06:41:33
14 and so forth. If **Wit Witness 1** saw me leave my office 06:41:38
15 without my mask on, he made an issue of that; so 06:41:46
16 let's say I forgot to put my mask on when I got up 06:41:51
17 to go grab something off the printer and then come 06:41:55
18 right back to my office, that was apparently an 06:41:59
19 issue for him, and he made it an issue. 06:42:03
20 Mr. Harper: If I could interject, Indhira, 06:42:11
21 if you don't mind. Are you saying he made fun of 06:42:15
22 you for that? 06:42:16

Transcript of Interview of Witness 2
Conducted on August 31, 2021

48

1 A No, I believe he was quite disturbed by it. 06:42:18
2 He was quite irritated by it. For whatever reason. 06:42:20
3 I think that the reason personally I can't speak 06:42:26
4 for him I felt as though the reason was because 06:42:29
5 we have to adjust our behavior for her when we enter 06:42:35
6 her office, but she is not being consistent in her 06:42:41
7 mask wearing or whatever when she exits her office. 06:42:51
8 Mr. Harper: If I could interject here, I 06:43:02
9 think probably this is getting into an area dealing 06:43:04
10 with the Congressional Accountability Act and some 06:43:07
11 other stuff, and I would recommend we probably not 06:43:10
12 go into that area any further. 06:43:11
13 BY MS. BENITEZ: 06:43:15
14 Q Could you talk to me about your relationship 06:43:15
15 with **Witness 5**? How was your relationship with 06:43:17
16 **Witness 5**? 06:43:22
17 A Well, **Witness 5** was brought on staff as a 06:43:23
18 Wounded Warrior. Of course, I had great respect for 06:43:28
19 him when he joined our staff. As time went on, I 06:43:35
20 could see that he I think he had anger management 06:43:42
21 issues, or he had kind of attitude issues. For 06:43:53
22 instance, on things that I mentioned earlier like 06:43:59

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21-4329_0215

Transcript of Interview of Witness 2
Conducted on August 31, 2021

49

1 complaining that he felt as though he was being 06:44:01
2 asked to contribute \$5 to a gift, I mean, you know. 06:44:04
3 So my personal relationship with him, I felt, was 06:44:10
4 fine, though. I mean, he was never mean to me 06:44:14
5 personally, but he did begin to exhibit mocking 06:44:17
6 behaviors. Once I came back into the office and was 06:44:30
7 adhering to CDC recommended guidelines for COVID 19, 06:44:35
8 and **Witness 5** would oftentimes exhibit overdramatic 06:44:44
9 mask mocking movements or 06:44:49
10 Q I'm sorry, Liz. Towards? 06:44:52
11 A Towards me. 06:44:56
12 Q Are you saying that **Witness 5** would mock you 06:44:57
13 for wearing a mask? 06:45:01
14 A That's correct. For instance, when we would 06:45:03
15 pass each other in our small walkway area here, he 06:45:07
16 would overly dramatically plaster himself to the 06:45:10
17 opposite side of the hall as I walked past. 06:45:13
18 Q He was remaining distant from you in the 06:45:18
19 hallway? 06:45:21
20 A Well, I suppose you could call it that. You 06:45:22
21 know, if you dramatically push yourself up against 06:45:33
22 the opposite wall where the person is walking past, 06:45:38

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21-4329_0216

Transcript of Interview of Witness 2
Conducted on August 31, 2021

50

1	I don't know.	06:45:41
2	Q Did he ever verbally mock you?	06:45:42
3	A He verbally laughed he laughed at me, and	06:45:44
4	he told me that what I was doing was ridiculous, so	06:45:49
5	I would say that's, you know, mocking.	06:45:59
6	Q He laughed at you and told you that what you	06:46:04
7	were doing was ridiculous. What exactly were you	06:46:07
8	doing?	06:46:10
9	A COVID 19 CDC's recommended guidelines for	06:46:10
10	protecting myself.	06:46:17
11	Q Did Brandon ever attempt to have any	06:46:17
12	partitions put in place in the office for staffers	06:46:25
13	that were coming in?	06:46:31
14	A Well, one of the instances where I felt he	06:46:37
15	was mocking me was when he physically mimed the	06:46:40
16	plastic zip wall installation in front of me in a	06:46:46
17	very grandiose and dramatic way. And I said	06:46:52
18	absolutely not. So that's one of the times I felt	06:46:59
19	it was a very mocking type of behavior, yes.	06:47:02
20	Q But was he attempting to put in this plastic	06:47:06
21	zip line wall in the office?	06:47:11
22	A No, just imaginary miming the action of	06:47:13

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21-4329_0217

Transcript of Interview of Witness 2
Conducted on August 31, 2021

51

1 installing it. 06:47:18

2 Q How did you know if it was imaginary, how 06:47:19

3 did you know it was a plastic zip line wall? 06:47:23

4 A Well, I could tell that that's what he was 06:47:25

5 motioning, that's what he was saying. He didn't say 06:47:28

6 anything. He just motioned it. He didn't say I 06:47:32

7 think we should install a plastic zip wall. He 06:47:37

8 motioned the installation of let's (making noise) 06:47:40

9 and then a zipper down. 06:47:46

10 Q That could be a door; that could be a 06:47:48

11 sliding door; that could be a fence. How did you 06:47:50

12 know it was a plastic zip line wall? 06:47:54

13 A That's what it looked like to me, and so 06:47:56

14 that's what I thought he meant. 06:47:58

15 Q You never heard him say that he was 06:47:59

16 interested in installing plastic zip line walls? 06:48:02

17 A Nope. 06:48:06

18 Q Or to further stop the spread of COVID 19? 06:48:08

19 A Or partition. I did not ever hear I 06:48:13

20 don't believe I heard him say that, no. Absolutely 06:48:24

21 not. I am not interested in having my office 06:48:27

22 partitioned off or having a plastic wall bubble 06:48:30

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21-4329_0218

Transcript of Interview of Witness 2
Conducted on August 31, 2021

52

1 installed around me, so he laughed and walked off. 06:48:34

2 Q So in this interaction, there were no words 06:48:39

3 exchanged. He motioned what you've described as a 06:48:49

4 plastic zip line wall, and then you responded with 06:48:52

5 not wanting this wall? 06:48:54

6 A Correct. 06:48:56

7 Q Apart from that interaction, did you have 06:48:56

8 any other interactions related to COVID 19 with 06:49:02

9 **Witness 5**? 06:49:06

10 Mr. Harper: Again, I think we'll probably 06:49:09

11 need to restrict where we're going just to make sure 06:49:12

12 we stay away from the subject of the lawsuit. I 06:49:14

13 know we touched on it a little bit here, but I think 06:49:20

14 that's probably as far as we need to go. 06:49:23

15 Q And, Liz, you mentioned at the very 06:49:26

16 beginning of the interview that you actually worked 06:49:31

17 for another Congressman before Representative 06:49:33

18 Lamborn. How long have you been working with the 06:49:40

19 House? 06:49:45

20 A I'm going on my 28th year. 06:49:45

21 Q That's a long time. 06:49:49

22 A I know. It is a very long time, but I do 06:49:51

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21-4329_0219

Transcript of Interview of Witness 2
Conducted on August 31, 2021

53

1 enjoy the work. I enjoy helping people, which is 06:49:58
2 something that I'm able to do through Congressman 06:50:01
3 Lamborn and through my former member of Congress, so 06:50:03
4 I feel very lucky that I'm able to serve in that 06:50:06
5 way. 06:50:09

6 Ms. Benitez: I'm going to take a minute or 06:50:13
7 two off camera just to go through my notes to make 06:50:17
8 sure we've covered everything. 06:50:22

9 Reporter: Would you also like to be off the 06:50:28
10 record? 06:50:30

11 Ms. Benitez: Apologies. Yes. 06:50:31

12 (Off the record.) 06:50:36

13 BY MS. BENITEZ: 06:50:38

14 Q We're almost wrapping up here. Liz, I just 06:50:38
15 have one or two more questions. In regard to the 06:50:41
16 errands, the unofficial errands that you ran for 06:50:43
17 Mrs. Lamborn, were you ever compensated for those 06:50:46
18 errands? 06:50:49

19 A Yes, I've been compensated for mileage, 06:50:51
20 things like that. You know, when we're talking 06:50:55
21 about driving a mile down the road and a mile back 06:51:02
22 while I'm on my way to, you know, McDonald's and 06:51:08

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21-4329_0220

Transcript of Interview of Witness 2
Conducted on August 31, 2021

54

1 it's on the way, it's kind of hard to, you know, 06:51:15
2 I've been remiss in even requesting a mileage 06:51:22
3 reimbursement for something that is en route that 06:51:25
4 I'm not going out of my way for. But in the past 06:51:28
5 for any campaign related things like yard sign 06:51:31
6 placement, I've been compensated for not only 06:51:39
7 mileage, but for time. 06:51:42

8 And I would like to reiterate that I have 06:51:44
9 never been asked to perform unofficial 06:51:49
10 campaign related duties during official time. 06:51:52

11 If I might add, and I even recall instances 06:51:57
12 where I've accidentally perhaps called, you know, on 06:52:04
13 a personal cell phone when I should have been using 06:52:12
14 an official cell phone, and little things like that, 06:52:16
15 that they're very astute in being aware of what the 06:52:23
16 rules are and abiding by them. So, yeah, I've never 06:52:31
17 had any problems with that. 06:52:35

18 Q And how were you compensated when you were 06:52:36
19 compensated? 06:52:39

20 A A check, or it could be I believe it was 06:52:39
21 by check. 06:52:42

22 Q Personal checks or 06:52:43

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21-4329_0221

Transcript of Interview of Witness 2
Conducted on August 31, 2021

55

1	A No. Campaign.	06:52:46
2	Q Okay. So 28 years you've been with the	06:52:47
3	House of Representatives. Are you thinking of	06:52:54
4	retiring any time soon?	06:52:58
5	A I began as a young woman, and it just went	06:53:00
6	like that. I started in 1994 actually working for a	06:53:05
7	member out of Indiana, and so I've lived through the	06:53:12
8	Clinton administration, all the way forward. It's	06:53:18
9	been quite an experience. I'd never change a thing.	06:53:23
10	I've very much enjoyed working for Congress, even	06:53:27
11	through the difficulties.	06:53:33
12	Q No plans on retiring any time soon?	06:53:34
13	A Oh, well, you know what they say; once you	06:53:37
14	stop moving, you know, that's it, so I don't know.	06:53:41
15	I might keep going if they'll have me.	06:53:43
16	Q Well, Liz, I want to thank you and also	06:53:48
17	thank Gregg. And, Omar, do you have something?	06:53:54
18	MR. ASHMAWY:	06:54:02
19	Q Yeah, before we wrap up, I just did have one	06:54:02
20	thing. Liz, you had said that you had not been	06:54:05
21	asked to perform campaign activities during official	06:54:08
22	time. Are you aware if anyone else was?	06:54:11

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21-4329_0222

Transcript of Interview of Witness 2
Conducted on August 31, 2021

56

1 A I'm not. I don't recall being aware of 06:54:14
2 anyone doing campaign related duties at the office. 06:54:18
3 I think that's something I would have recognized as 06:54:23
4 happening, and, you know, it would have resonated 06:54:30
5 with me; so I can say that, no, I don't recall 06:54:36
6 anyone doing unofficial campaign related duties 06:54:40
7 during official working hours, no. 06:54:43
8 Q You don't have any knowledge of it, to be 06:54:46
9 clear? 06:54:48
10 A No, I don't. I have no knowledge of anyone 06:54:49
11 doing that, so I don't know. 06:54:51
12 Mr. Ashmawy: Fair enough. Thank you very 06:54:55
13 much. I'll preempt Indhira and say thank you very 06:54:56
14 much for your time, and I'll let her wrap this up. 06:55:01
15 Mr. Harper: Indhira, if I could just 06:55:04
16 interject one or two little follow up questions. 06:55:06
17 BY MR. HARPER: 06:55:09
18 Q Witness 2, you've mentioned that there was a 06:55:09
19 certificate of congratulations given to Oksana, and 06:55:13
20 do you do those on occasion for other constituents 06:55:17
21 or for special events or for something significant 06:55:23
22 that occurred for a particular constituent? 06:55:26

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21-4329_0223

Transcript of Interview of Witness 2
Conducted on August 31, 2021

57

1 A Correct. We keep a supply of those special 06:55:29
2 Congressional certificates of recognition, and they 06:55:32
3 could be given to folks for a myriad of different 06:55:38
4 reasons, one of which is for citizenship. 06:55:41

5 Q And have you done those specifically for 06:55:44
6 citizens where others were naturalized? 06:55:46

7 A Yes. Not as many as I would like though 06:55:49
8 because the State Department won't give us names of 06:55:52
9 folks that are getting it ahead of time. If I could 06:55:57
10 do one for every single person, I would. 06:56:00

11 Ms. Benitez: And just to clarify 06:56:05

12 BY MR. ASHMAWY:

13 Q Can I asking something, Liz? How many times 06:56:14
14 have you thrown a party for a constituent who got 06:56:20
15 naturalized? 06:56:23

16 A Thrown a party for a constituent? 06:56:27

17 Q Yeah, because they became an American 06:56:29
18 citizen. 06:56:31

19 A None that I can think of. 06:56:32

20 Mr. Ashmawy: Omar. None that I can think 06:56:34
21 of. 06:56:36

22 Mr. Harper: I don't have any other 06:56:36

Transcript of Interview of Witness 2
Conducted on August 31, 2021

58

1 follow up, Indhira, if you want to wrap up.

06:56:38

2 Ms. Benitez: Nope. I don't have any other

06:56:40

3 additional questions. We can hop off the record.

06:56:42

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21-4329_0225

EXHIBIT 5

CONFIDENTIAL

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

Transcript of Interview of Witness 4

Review No. 21-4329
September 7, 2021

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OCE Rev. No. 21-4329

Interview of Witness 4

Conducted Virtually

Tuesday, September 7, 2021.

1:35 p.m. EST

Job No. 397627

Page: 1 - 33

Transcribed by: Alexa Renfro

Transcript of Interview of Witness 4
Conducted on September 7, 2021

1 Interview of Witness 4, conducted virtually.

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ALL PARTIES ATTENDED REMOTELY

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A P P E A R A N C E S

INDHIRA BENITEZ, ESQUIRE

ANNIE CHO, EQUIRE

OFFICE OF CONGRESSIONAL ETHICS (OCE) OF THE
U.S. HOUSE OF REPRESENTATIVES

425 3rd Street, Southwest, Suite 11100
Washington, D.C. 20024
202.225.9739

GREGG HARPER, ESQUIRE

WATKINS & EAGER

400 East Capitol Street
Jackson, MS 39201
601.291.6839

Also Present: Remote Technician, Vane Morrison

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C O N T E N T S

INTERVIEW OF WITNESS 4	Page
By Ms. Benitez	5

E X H I B I T S

(None)

Transcript of Interview of Witness 4
Conducted on September 7, 2021

5

1 P R O C E E D I N G S

2 MS. BENITEZ: For the record, today is
3 September 7, 2021. We are conducting the virtual
4 interview of Witness 4. Witness 4 is represented
5 by counsel who is present with us today, Gregg
6 Harper. I'm also joined today by my colleague,
7 Annie Cho. Speaking is Indhira Benitez,
8 Investigative Counsel with the Office of
9 Congressional Ethics. The witness has been given
10 a copy of 18 USC 1001, the false statements act.
11 And she has signed, acknowledged, and returned
12 that back to our office.

13 Witness 4, how long have you been working
14 for Representative Lamborn?

15 WITNESS 4: I began working for the
16 Congressman in March of 2019.

17 MS. BENITEZ: In what capacity?

18 WITNESS 4: His communication director.

19 MS. BENITEZ: What is your current role?

20 WITNESS 4: Communication director.

21 MS. BENITEZ: Where were you before you
22 were the Congressman's communication director?

Transcript of Interview of Witness 4
Conducted on September 7, 2021

6

1 WITNESS 4: I worked as the executive
2 director for the Republican party here in
3 Colorado.

4 MS. BENITEZ: How did you meet
5 Representative Lamborn?

6 WITNESS 4: I met him in 2013 or 2014 when
7 I was a college Republican volunteering at the El
8 Paso County Republican headquarters. I don't
9 remember in what capacity, but I was volunteering.

10 MS. BENITEZ: And how would you describe
11 your relationship with the Congressman today?

12 WITNESS 4: Always very friendly. He has
13 always been very kind to me. I've always been
14 very supportive of his work.

15 MS. BENITEZ: What are some of your duties
16 as communication director?

17 WITNESS 4: So I oversee all of our press
18 and communications. Anything that goes out as far
19 as newsletters or press releases, I help write
20 talking points. I do social media -- Twitter,
21 Facebook, things like that. And then I do a small
22 portion of outreach for the Congressman. Whether

Transcript of Interview of Witness 4
Conducted on September 7, 2021

7

1 that is event outreach or, you know,
2 person-to-person outreach, anything in between.

3 MS. BENITEZ: And in the course of your
4 day-to-day when you are performing your job
5 duties, do you have to summarize what you are
6 doing day-to-day in a daily report to send to
7 anyone?

8 WITNESS 4: Yes. We send out daily
9 reports at the end of every day.

10 MS. BENITEZ: What do these daily reports
11 consist of?

12 WITNESS 4: It kind of depends on the day.
13 For the most part, just the basic things that you
14 did during that day. So, for instance, mine
15 usually is our morning huddle, our morning
16 meeting, answering phones, press inquiries -- and
17 that could be a variety of different things,
18 social media posts, perhaps loading and sending
19 out a press release. Sometimes I'll have a
20 meeting with a news station here and there or a
21 constituent here and there that wants to sit down
22 and talk about something. Just a variety of

Transcript of Interview of Witness 4
Conducted on September 7, 2021

8

1 different things kind of in that lane.

2 MS. BENITEZ: So a summary for that
3 particular workday?

4 WITNESS 4: Yes. And sometimes I use this
5 to clarify details if I need to, but for the most
6 part, it is a summary.

7 MS. BENITEZ: And who does this daily
8 report go to?

9 WITNESS 4: So the entirety of the
10 district in the D.C. office -- send it to one
11 person and they are compiled, and they are sent
12 out to the Congressman, Mrs. Lamborn, and then the
13 entirety of the staff. So we have a full-blast
14 list that we send it out to.

15 MS. BENITEZ: Do you know whether
16 Mrs. Lamborn has an official role in the office?

17 WITNESS 4: An official role in the
18 office? No, she does not.

19 MS. BENITEZ: Do you know why the daily
20 reports go to Mrs. Lamborn?

21 WITNESS 4: I believe just an overall
22 understanding of what is going on in the office.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

9

1 That is what I believe they are used for.

2 MS. BENITEZ: Have you met Mrs. Lamborn?

3 WITNESS 4: Have I what?

4 MS. BENITEZ: Have you met Mrs. Lamborn?

5 WITNESS 4: Yes.

6 MS. BENITEZ: How often do you speak with
7 her or interact with Mrs. Lamborn?

8 WITNESS 4: On the official side, I speak
9 with her whenever we see the Congressman, if they
10 come into the office for something. It is not
11 often.

12 MS. BENITEZ: What do you mean on the
13 official side?

14 WITNESS 4: So I'm sure you're aware that
15 I also work on the campaign communication side of
16 things also.

17 MS. BENITEZ: So on the -- so you worked
18 on campaign-related activities?

19 WITNESS 4: Yes.

20 MS. BENITEZ: And do you have an official
21 role on the campaign?

22 WITNESS 4: Communications director.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

10

1 MS. BENITEZ: Okay. Do you work closely
2 with Mrs. Lamborn on campaign-related activities?

3 WITNESS 4: Yes.

4 MS. BENITEZ: What kind of
5 campaign-related activities do you do?

6 WITNESS 4: Press inquiries that we get.
7 I'm sure you're aware that sometimes media has
8 inquiries that are more campaign driven versus the
9 official side. When they are campaign driven,
10 they go to the campaign side. When they are
11 official, they stay on the official side.

12 MS. BENITEZ: Has Mrs. Lamborn ever
13 reached out to you for -- to perform any
14 campaign-related work while you were not doing
15 campaign-related work?

16 WITNESS 4: Can you clarify not doing
17 campaign-related work?

18 MS. BENITEZ: Sure. Has Mrs. Lamborn
19 ever reached out to you while you were during
20 official work hours?

21 WITNESS 4: She has messaged me but not
22 expected for me to call and contact her until

Transcript of Interview of Witness 4
Conducted on September 7, 2021

11

1 after my work hours were done on the official
2 side. And that has been clarified to me many
3 times.

4 MS. BENITEZ: And she has messaged you on
5 your computer? On your cellphone? How has she
6 messaged you?

7 WITNESS 4: Sometimes emails, sometimes by
8 text.

9 MS. BENITEZ: Does she email your official
10 House email address?

11 WITNESS 4: No.

12 MS. BENITEZ: Have you ever corresponded
13 with her on her official House email address?

14 WITNESS 4: I don't believe so.

15 MS. BENITEZ: Are you aware that
16 Mrs. Lamborn has an official House email address?

17 WITNESS 4: Yes. I have seen it in the
18 email chains, but I don't think I have ever seen
19 her reply to any sort of chain respond that has
20 happened.

21 MS. BENITEZ: Has Mrs. Lamborn ever --
22 well, let me withdraw that.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

12

1 You mentioned that she'll message you
2 sometimes during work hours. What is she
3 messaging you about? Is she requesting something
4 from you or asking you for something?

5 WITNESS 4: Well, sometimes it is in her
6 response to my message to her. For instance, if I
7 get a press inquiry that is campaign related, I
8 will -- depending on what is going on for the day,
9 if it is my lunchtime, I will step out. Maybe I
10 will email her from home that night after work.
11 Sometimes she'll take a day to get back to me. So
12 it just sort of depends on the flow of what is
13 going on and all of our schedules, but she'll
14 respond to a press inquiry that I have sent.
15 Sometimes the Congressman will do that as well.
16 It is not just her. Sometimes it is both of them
17 together. And then we will usually come up with a
18 plan to respond or however you want to deal with
19 the situation.

20 Sometimes I'll help with events also on
21 the campaign side, and that has to do with my
22 communication role as well. Making sure we use

Transcript of Interview of Witness 4
Conducted on September 7, 2021

13

1 social media, any kind of photographs that we like
2 to have in our file, put on our website, things
3 like that.

4 MS. BENITEZ: Annie?

5 MS. CHO: Witness 4, you mentioned that
6 you never saw any sort of email exchanges coming
7 from Mrs. Lamborn's official House email address.
8 Would you know how she accesses her House email
9 address?

10 WITNESS 4: I don't know.

11 MS. CHO: Do you know if she has any
12 official House phone, cell phone, laptop, iPad?

13 WITNESS 4: No. I have no idea.

14 MS. CHO: And you mentioned that you asked
15 to work on the campaign side as well as a
16 communication director. Could you give an example
17 of what your work week would look like in terms of
18 how you split your time at the official office and
19 how you split your time at the campaign?

20 WITNESS 4: Yes. Usually, I arrive at the
21 office at about 7:15 for my official position. I
22 work there until the end of the day, 5:00 o'clock.

1 Sometimes it is later, you guys know our schedules
2 fluctuate slightly; so I will do my work there. I
3 don't take lunch every day, but if I need to take
4 a lunch, I will take a lunch in there and do
5 personal errands or whatever, and sometimes
6 that -- you know, if I'm on my lunch, I'll respond
7 to an email on the campaign side or whatever. And
8 then usually, the bulk of my campaign work is done
9 at home right here on this dining room table you
10 see me sitting at on my own free time -- spare
11 time.

12 MS. BENITEZ: Have you ever -- I'm sorry.
13 Annie, do you have something else?

14 MS. CHO: No. I was just --

15 WITNESS 4: I'd like to clarify something.
16 I just want to make sure I'm crystal clear on
17 this.

18 I don't do campaign work at my work desk.
19 I only do my campaign work here or outside of the
20 office. And that has been -- when I started this
21 job, that was made crystal clear to me that was a
22 black and white line that I was not to cross; so I

Transcript of Interview of Witness 4
Conducted on September 7, 2021

15

1 have not crossed that line.

2 MS. CHO: And just to clarify, when did
3 you start -- when did you ask to work on the
4 campaign side as well?

5 WITNESS 4: It was pretty quickly after I
6 started. I don't have an exact date. Maybe a
7 couple months.

8 MS. CHO: Okay. Thank you.

9 MS. BENITEZ: I want to go back to the
10 messages that you mentioned you received from
11 Mrs. Lamborn. You said sometimes they are in
12 response to your messages to her. Has she ever
13 reached out to you asking you to do something that
14 is campaign related, whether it is pick up mail or
15 whatever the case may be?

16 WITNESS 4: Yes. I work on the campaign,
17 so she's asked me to do things on the campaign.

18 MS. BENITEZ: And when she reaches out to
19 you, is this via telephone? Or is this always via
20 message?

21 WITNESS 4: She's called me before. She's
22 messaged me. You know, on the weekend, if there

Transcript of Interview of Witness 4
Conducted on September 7, 2021

16

1 is something going on, she'll call me about it.
2 It is not consistent. We are not a campaign-heavy
3 office so it does not happen often.

4 MS. BENITEZ: How often would you say, if
5 you had to estimate, approximately?

6 WITNESS 4: That we do campaign work
7 together?

8 MS. BENITEZ: Yes, per month.

9 WITNESS 4: In a busy season, twice a
10 month, maybe three times a month. On the off
11 season, sometimes not at all.

12 MS. BENITEZ: Annie?

13 MS. CHO: Yeah. I just wanted to follow
14 up, what is Mrs. Lamborn's role in the campaign?

15 WITNESS 4: She's the campaign manager.

16 MS. CHO: Okay. Thank you.

17 MS. BENITEZ: Has Mrs. Lamborn ever
18 reached out to you to perform any personal
19 errands.

20 WITNESS 4: No, not that I'm aware of.
21 Everything she's asked me to do has been campaign
22 related.

1 MS. BENITEZ: Have you ever been to Mr.
2 and Mrs. Lamborns' home?

3 WITNESS 4: Yes.

4 MS. BENITEZ: How many times?

5 WITNESS 4: Many times.

6 MS. BENITEZ: And what has brought you
7 over to their residence?

8 WITNESS 4: If there is a press interview
9 -- and this is official and unofficial. Sometimes
10 we do press interviews at his home on the official
11 side. Sometimes we'll do them on the unofficial
12 side at his home. Sometimes we will do a video
13 recording at his home on the official side.
14 Sometimes we will do a video recording on the
15 unofficial side. If he does radio -- any kind of
16 press driven activity. Sometimes we do them at
17 the office, and sometimes we will do them at his
18 home. It just depends what is going on.

19 MS. BENITEZ: And I don't think I touched
20 on this earlier. Who do you report to?

21 WITNESS 4: For what?

22 MS. BENITEZ: As communication director?

Transcript of Interview of Witness 4
Conducted on September 7, 2021

18

1 WITNESS 4: On the campaign side or on the
2 official side?

3 MS. BENITEZ: On the official side.

4 WITNESS 4: So I'm a direct report to the
5 Congressman and the Chief of Staff.

6 MS. BENITEZ: The Chief of Staff and the
7 Congressman have always been your direct
8 supervisors?

9 WITNESS 4: Correct.

10 MS. BENITEZ: You mentioned that
11 Mrs. Lamborn doesn't have an official role on the
12 official side. She does work for the campaign
13 though; correct?

14 WITNESS 4: Yes.

15 MS. BENITEZ: Do you find it odd that
16 Mrs. Lamborn is copied on the daily reports on the
17 official side?

18 THE WITNESS: No.

19 MS. BENITEZ: Who are the daily reports
20 intended for?

21 WITNESS 4: Everyone.

22 MS. BENITEZ: Everybody being?

Transcript of Interview of Witness 4
Conducted on September 7, 2021

19

1 WITNESS 4: Everyone sees the daily
2 reports. We all know what is going on. I could
3 tell you that Susie Mae, yesterday, did this and
4 this and this. And as the communication director,
5 I look at everyone's daily reports because I want
6 to make sure there is not something that I'm
7 missing that we need to talk about or that I need
8 to be looking defensively at or offensively at.
9 I know that it is symbiotic in our office. We all
10 work with each other trying to do a good job for
11 our constituents. So it is very important that we
12 are all on the same team, and that we are all
13 going in the same direction. And I think that is
14 the purpose of the daily reports.

15 MS. BENITEZ: So everyone on the staff?
16 I'm sorry. I just want to clarify that.

17 WITNESS 4: Correct.

18 MS. BENITEZ: Are non-staffers privy to
19 the daily reports?

20 WITNESS 4: I don't know that information.

21 MS. BENITEZ: Is Mrs. Lamborn a staffer?

22 WITNESS 4: No. I have already clarified

1 that with you.

2 MS. BENITEZ: Why would Mrs. Lamborn be
3 privy to daily reports?

4 WITNESS 4: I don't know.

5 MS. BENITEZ: But you don't find it odd?

6 WITNESS 4: No.

7 MS. BENITEZ: Annie?

8 MS. CHO: Was staff ever told or informed
9 that Mrs. Lamborn would be receiving the daily
10 reports?

11 WITNESS 4: I don't know.

12 MS. CHO: You mentioned earlier that the
13 daily reports -- you send them to that one person,
14 and that one individual sends it out to the rest
15 of the staff? Does that one person change on a
16 daily basis, or is there a designated individual
17 that receives it from you?

18 WITNESS 4: It changes. It is usually the
19 scheduler or the secretary. But I'm sure you guys
20 understand that they are not always there. They
21 are not always able to do it; so we all take the,
22 you know, rotation when we -- I have sent them

Transcript of Interview of Witness 4
Conducted on September 7, 2021

21

1 out. You know, our Chief of Staff has sent them
2 out. It is not just one person.

3 MS. CHO: So you -- during your time, you
4 have sent out these daily reports to the staff?

5 WITNESS 4: Just a few times.

6 MS. CHO: And were you instructed to send
7 the daily reports to Mrs. Lamborn?

8 WITNESS 4: So I wasn't ever instructed to
9 do it. That is just how it has always been since
10 I started.

11 MS. CHO: Okay.

12 WITNESS 4: There was no meeting or
13 conversation that said, thou shall do this. It
14 has just been that way.

15 MS. CHO: Okay.

16 MS. BENITEZ: Do you know the
17 Congressman's son, [REDACTED] ?

18 WITNESS 4: Yes.

19 MS. BENITEZ: Do you know when he moved to
20 Washington, D.C.?

21 WITNESS 4: I believe it was last summer.
22 Probably last summer.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

22

1 MS. BENITEZ: Do you know where [REDACTED] was
2 living?

3 WITNESS 4: Before that?

4 MS. BENITEZ: When he moved to Washington,
5 D.C., where was he living in D.C.?

6 WITNESS 4: I don't know. I have no idea.
7 Sorry, Gregg?

8 MR. HARPER: I'm just saying, if you know,
9 you can answer. But you answered it, so thank
10 you.

11 WITNESS 4: I have no firsthand knowledge
12 of that.

13 MS. BENITEZ: Firsthand knowledge of?

14 WITNESS 4: Where he was living.

15 MS. BENITEZ: Do you know if the
16 Congressman has a storage space that is located
17 outside of his office?

18 WITNESS 4: I do not know.

19 MS. BENITEZ: Going back to your -- how
20 you split your time between the official work and
21 the campaign work. You mentioned that
22 Mrs. Lamborn has called you on occasion to perform

1 campaign work but that is very rare; correct?

2 WITNESS 4: Yes.

3 MS. BENITEZ: Has she ever called you for
4 a personal errand whether that be to pick up mail
5 or stop by somewhere?

6 WITNESS 4: No.

7 MS. BENITEZ: Do you know of any other
8 staffers who Mrs. Lamborn may have reached out to
9 for campaign-related work, or personal errands?

10 WITNESS 4: I have no firsthand knowledge
11 of it.

12 MS. BENITEZ: Annie?

13 MS. CHO: Going back to [REDACTED]'s living
14 arrangements.

15 You said that you didn't have any
16 firsthand knowledge of where he lived. Were you
17 told from anyone on staff where he was living?

18 WITNESS 4: Gregg, I don't know if I'm
19 comfortable. It is all kind of rumor mills, I'm
20 not comfortable.

21 MR. HARPER: I would say, if you know,
22 answer. But if she has no firsthand knowledge,

1 then I would say she shouldn't answer that.

2 MS. BENITEZ: Gregg, I'm not asking about
3 firsthand knowledge. I'm just asking whether or
4 not she was told if he was residing anywhere.

5 WITNESS 4: So I've seen the newspapers,
6 obviously, and the press person. I read every
7 single paper that comes out with my boss's name on
8 it, but I have no firsthand knowledge.

9 MS. BENITEZ: Apart from the newspaper,
10 have you heard that information from anywhere else
11 or anyone else?

12 WITNESS 4: On staff?

13 MS. BENITEZ: Yes.

14 WITNESS 4: I'm not comfortable talking
15 about third-hand stuff. I'm comfortable telling
16 you with what I know and what I have seen.

17 MS. BENITEZ: You don't have to talk about
18 it. It is just yes or no whether you heard it
19 from staff or not.

20 MR. HARPER: I think that would be an
21 answer. She has indicated that she is not
22 comfortable discussing something that she doesn't

1 have firsthand knowledge on. I think that is a
2 proper answer.

3 WITNESS 4: Thank you.

4 MS. BENITEZ: Okay. Witness 4, we are
5 going to go ahead and take a very, very quick
6 break off camera. I will be back. I'm just going
7 to go through my notes to make sure that we
8 covered everything. If we did, we will wrap it up
9 and we will be good to go.

10 (Whereupon, a recess was taken.)

11 MS. BENITEZ: Okay. Just a couple for
12 questions, Witness 4.

13 Regarding the campaign work, were you ever
14 compensated?

15 WITNESS 4: Yes. I was compensated for
16 last campaign season. And then I'm on a monthly
17 retainer now for my work.

18 MS. BENITEZ: Okay. And how are you
19 compensated?

20 WITNESS 4: How do I get my payment?

21 MS. BENITEZ: Yes.

22 WITNESS 4: I get a check every month.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

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1 MS. BENITEZ: Is it a personal check from
2 the Congressman, or Mrs. Lamborn?

3 WITNESS 4: I think it comes --

4 Is this information that should be given
5 out, Gregg? Is this okay?

6 MR. HARPER: I do think that it would be
7 pretty clear. Either FEC reports would show that
8 there would be a payment made from the campaign to
9 someone typically doing campaign work. I can't
10 speak for what it would say on Witness 4, but I
11 believe that most folks would get a campaign
12 check. I'm just not sure what that would have to
13 do with what we are looking at now, Indhira. If
14 you could just clarify for me.

15 MS. BENITEZ: I would just like to know
16 how she was compensated for her campaign work.

17 MR. HARPER: Okay. If I could just ask a
18 question.

19 Witness 4, you received an official --
20 when you are doing official work, you are paid out
21 of the MRA from the Congressman's office --

22 MS. BENITEZ: I'm sorry to jump in.

Transcript of Interview of Witness 4
Conducted on September 7, 2021

27

1 Gregg, that is not my question for Witness 4. My
2 question for Witness 4 is how does she get paid
3 for her campaign work?

4 MR. HARPER: Hold on. I was not through
5 with my question, Indhira. I mean, I was getting
6 there. Just -- you know, being from the south, we
7 take a little longer to get to the point, but we
8 will get there, if you could give us just a
9 minute.

10 So you are paid by the official side and
11 by the campaign side; is that correct?

12 WITNESS 4: That is correct.

13 MR. HARPER: And then the question is:
14 Who does that check come from on the campaign
15 side? I'm not sure of the relevancy of that,
16 Indhira. I'm happy to hear a little bit more on
17 that.

18 MS. CHO: I think Indhira is just trying
19 to get to the point of, you know, are you
20 receiving a check from the official side? The
21 campaign side? That is it. A simple question.

22 WITNESS 4: I'm paid by the campaign for

1 the campaign work I do.

2 MS. CHO: So the check is coming from the
3 campaign side?

4 WITNESS 4: Correct.

5 MR. HARPER: That makes sense.

6 MS. BENITEZ: Lastly, just following up
7 regarding [REDACTED] Lamborn.

8 You mentioned that you didn't have any
9 firsthand knowledge about where he was residing.

10 Did you ever observe [REDACTED] to be
11 staying in any facility within the US House of
12 Representatives?

13 WITNESS 4: No. I never observed him
14 staying there. I don't even observe what -- you
15 know, in my boss's office. That -- I don't have
16 any knowledge of that, yeah.

17 MS. BENITEZ: Did you ever have
18 discussions about where [REDACTED] was residing
19 when he moved to D.C.?

20 MR. HARPER: If that is conversations with
21 the Congressman, I would not --

22 MS. BENITEZ: They are conversations,

1 generally, with anyone -- Congressman, staffers.
2 Did you ever have conversation with anyone
3 regarding where [REDACTED] was residing. I just
4 want to remind you about the False Statements Act.

5 MR. HARPER: Indhira, we've been doing
6 really well. She is telling the truth. She is
7 not --

8 MS. BENITEZ: I'm just asking her a simple
9 question, Gregg.

10 MR. HARPER: That is a threat. That is
11 almost --

12 MS. BENITEZ: It is not a threat. It is a
13 simple yes or no question.

14 WITNESS 4: And I'll have a simple yes or
15 no answer.

16 I have no firsthand knowledge of where
17 [REDACTED] slept.

18 MS. BENITEZ: Correct. We've discussed
19 that. And I'm asking whether or not you ever had
20 any discussion with anyone regarding where [REDACTED]
21 Lamborn resided?

22 WITNESS 4: I'm not comfortable about

1 answering rumor mills. And I'm not comfortable
2 because I have been reading the news. I'm sorry.

3 MS. BENITEZ: Correct. I'm not asking
4 about the news or what you heard. I'm asking
5 whether you took part in conversations that
6 regarded the topic of where [REDACTED] was
7 residing?

8 WITNESS 4: Gregg, do you I need to answer
9 this?

10 MR. HARPER: Look, we're not -- what I'm
11 looking at, Indhira, is this, we admitted where he
12 would have stayed. That is no secret, so I'm not
13 sure that the relevancy of this. And I know --
14 knowing Witness 4, I know she wants to be and is
15 being fully corporative and not withholding
16 anything here. I need a little more in order to
17 advise her as to why this is an issue for OCE.

18 MS. BENITEZ: It is an issue, because I
19 would like to know, apart from the press releases
20 and the newspaper articles that you read, if you
21 personally, yourself, had conversation with anyone
22 regarding where [REDACTED] was residing. I

1 don't want you to tell me what anyone told you,
2 just whether or not you took part in conversations
3 in discussing where he resided.

4 MR. HARPER: Indhira, if I could just say
5 that she is the communication director. If there
6 is news stories, that it would be very proper and
7 expected that you would have conversations about
8 that with the team.

9 So Witness 4, you can answer that, and say
10 whether you had discussions based upon the news
11 articles that you read.

12 WITNESS 4: Yes. Based upon the news
13 articles, absolutely. Yes.

14 MR. HARPER: Does that give you what you
15 need Indhira?

16 MS. BENITEZ: It was exactly what I was
17 asking initially. Yes, Gregg.

18 MR. HARPER: Took a while to get there.
19 Sorry.

20 MS. BENITEZ: I don't believe I have any
21 further questions. Annie, do you have anything
22 else?

Transcript of Interview of Witness 4
Conducted on September 7, 2021

1 MS. CHO: No. Not at the moment.

2 (Off the record at 2:09 p.m.)

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EXHIBIT 6

Tapia, Elizabeth

From: Tapia, Elizabeth
Sent: Wednesday, July 3, 2019 4:40 PM
To: Rutzen, Linda
Subject: Daily

Casework tasks (steady influx – Social Security & immigration)
Helped load booth supplies into Tony's truck in preparation of tomorrow's event
Referral letters
Organized correspondence & pending privacy forms
Ran unofficial errand during my lunch break
Spoke with our USPS liaison regarding an elderly lady with dementia and her constant and ongoing issues with her letter carrier
Research and reading
Monitored general inbox and distribution to proper staffer – sent acknowledgement emails
Monitored new casework requests & promoted items in InterTrac – sent acknowledgment emails
Set up away message in Outlook for tomorrow and Friday

Elizabeth (Liz) Tapia
Senior Caseworker / Academy Nomination Coordinator
Congressman Doug Lamborn
1125 Kelly Johnson Boulevard, Suite 330
Colorado Springs, CO 80920
Desk: [REDACTED]
Main: 719-520-0055
Fax: 719-520-0840

Tapia, Elizabeth

From: Tapia, Elizabeth
Sent: Friday, August 16, 2019 12:21 PM
To: Patrick Cook
Subject: RE: Thank You!

Thank you so much Patrick! House Ethics rules are pretty strict when it comes to gifts – so it's best for us to not accept them. Home-baked items are allowed – as long as we offer them to constituents too.

A thank you card is always much appreciated!

Most sincerely,

Elizabeth (Liz) Tapia
Senior Caseworker / Academy Nomination Coordinator
Congressman Doug Lamborn
1125 Kelly Johnson Boulevard, Suite 330
Colorado Springs, CO 80920
Desk: [REDACTED]
Main: 719-520-0055
Fax: 719-520-0840

From: Patrick Cook [REDACTED]
Sent: Friday, August 16, 2019 11:51 AM
To: Tapia, Elizabeth [REDACTED]
Subject: Thank You!

Hey Liz,

Just wanted to express our thanks for your assistance with visas the last few weeks. Could we send your office a thank-you gift sometime next week? If that's permissible just let me know what would be a hit and how many people are in the office. I was thinking pastries or a coffee delivery but we're open to ideas!

Thanks!

Patrick Cook
Every Home for Christ

Tapia, Elizabeth

From: Rutzen, Linda
Sent: Wednesday, September 18, 2019 6:56 PM
To: Lamborn, Doug; Lamborn, Jeanie; CO05-District; CO05-DC Staff
Subject: District staff daily reports

Linda:

- Phones
- Tours
 - Processing new; scheduling; sending updates; accommodating change requests; follow-up calls
 - Managing confirmed and new WH VIP tours
 - Tracking tours from website/intertrac/Outlook
 - Office meetings w/two separate walk-ins re: DC trips/tours
- Pikes Peak Regional Air Show (this Saturday):
 - Calls and emails with air show staff
 - Generating new/editing maps and directions
 - Creating packets for staff
 - Updating calendar event
 - Staff huddle to review logistics
- Processing mail
- Compiling/sending daily reports

Liz:

- Morning staff huddle regarding booth logistics & staffing for this weekend
- Updated Marcus on a Medicaid referral issue
- Helped Tony load booth supplies onto his truck
- Routine casework tasks
- Spoke with a representative at Disability Determination Service regarding a sensitive disability case
- Updated case notes in InterTrac
- Unofficial errand during my lunch hour
- Monitored general inbox & promoted items in InterTrac
- Academy application intake, data entry and acknowledgment emails
- Made copies of academy applications in preparation of panelist packets
- Updated my event TO-DO list(s)
- Met with a couple who want assistance with their immigration visas (Pastor Jeff referral)
- Met with a walk-in late afternoon regarding a visa issue
- Emailed the Consulate of the Bahamas located in Aurora, CO regarding a missing pastor (Pastor Jeff referral)
- Phones

Jeff:

- Faith outreach to SIM and TEAM missions International. They had a gathering of pastors and missionaries to discuss Africa. About 15 in attendance.
- Faith outreach to Cheryl Morford of Pike's Peak United Way, and a Kenyan Pastor Richard, who is affiliated with several area ministries and churches. Among other things, we discussed USAID
- Worked with Joe on Congressional Record of congratulations for Charis Bible College. 25th anniversary
- Meeting with Alex Lagerborg of Seed company and Wycliffe Bible translators. They are wanting to invite the Congressman to address an event in December.

- Meeting with Charis Bible college International prospective students, Stefan and Ursula, concerning a student of work visa.
- Meeting with Linda to hear details for the airshow outreach this weekend.
- Variety of correspondence and scheduling
- Correspondence with Henry Allen concerning the Pike's Peak Southern Christian Leadership Conference meeting this Saturday. They will be addressing the shooting of DaVon Bailey.
- Interaction with Wayne Williams concerning the shooting, meetings, etc.

Brandon:

- Answered phones
- Worked in InterTrac
- Helped load truck for airshow
- Staff huddle for Air Show prep
- Veteran walk-in (QTC/C&P Issue) coordinate with VARO
- PACF sent to veteran (final pay issue)
- USMC AD suicidal ideations report via third party (Liz assisted & Marine is safe)
- Call from Kuwait about family housing on Carson (gave contact info to chain of command and waiting for local spouse to call back)
- Sent resources for immigration issues
- Sent resources for local VSOs to veteran (referred by CBOC patient advocate)

Tony:

- Optometry appointment
- Team huddle about the Air Show
- Loaded truck with booth supplies
- Met with walk-in
- Answered emails
- Tracked down escaped dogs, NOT Sapper, my other 3
- Attended American Legion meeting/reunion
- Continuing to work with Brando for top 10 Veteran Issues in the District

Cassandra:

- Email correspondence
- Set up interview with Tom Roeder
- Call with James about California emissions
- Call with Wes RE social media
- Call with Andy- press planning
- Work on DWP reimbursement forms
- Meeting about Air Show
- Catch up on reading
- Clean desk
- Looking at calendar for future press opportunity

Marcus: In DC

Emily K... | Staff Assistant | Tour Scheduler
 Office of Congressman Doug Lamborn
 1125 Kelly Johnson Blvd., Suite 330, Colorado Springs, CO 80920
 Direct [REDACTED] Office Main: 719.520.0055

Tapia, Elizabeth

From: Tapia, Elizabeth
Sent: Thursday, September 19, 2019 10:17 AM
To: Rutzen, Linda; Pope, Brandon
Subject: Lunch

I have to run an errand for the Mrs. again today. I'd like to take my lunch at 11:00 a.m. if that works for everyone.

Elizabeth (Liz) Tapia
Senior Caseworker / Academy Nomination Coordinator
Congressman Doug Lamborn
1125 Kelly Johnson Boulevard, Suite 330
Colorado Springs, CO 80920
Desk: [REDACTED]
Main: 719-520-0055
Fax: 719-520-0840

Tapia, Elizabeth

From: Rutzen, Linda
Sent: Thursday, September 19, 2019 5:36 PM
To: Lamborn, Doug; Lamborn, Jeanie; CO05-District; CO05-DC Staff
Subject: District staff daily reports

Linda

- Phones
- Tours
 - Processing new
 - Scheduling
 - Sending updates
 - Handling change requests
 - Many follow-up calls
 - Coordinating WH VIP tours
 - Performing workarounds to accommodate intertrac/Outlook/website issues
- Lobby: Assisting prayer mtg. guests, academy applicants, walk-ins
- Giving a friend a tour of the office and introducing to staff
- Providing info to IT re: image stick for Brandon's computer
- Fielding casework request calls (heavy)
- Administrative/accounting catch-up call with Dale
- Processing mail
- Compiling/sending daily reports

Liz:

- Nomination interview scheduling
- Sent out interview notifications to applicants
- Monitored email confirmations / scheduling change requests
- Application intake, entered data to spreadsheet and made photocopies
- Contacted Colonel Huber for a list of students going on AFJROTC trip on the same date as our interviews
- Routine casework tasks
- Unofficial errand during my lunch break
- Monitored general inbox & promoted cases in InterTrac – sent acknowledgment emails
- Spoke with our liaison at the SSA regarding a sensitive disability case
- Spoke with Dale about a sensitive disability case, drafted a letter to the constituent and provided a copy to Dale
- Phones

Jeff:

- Meeting With Rob Reiter of the Sanctuary Church
- Hosted a prayer meeting of the Promise Keepers at the district office. About 10 men gathered to pray with us for the country, international governments, our state, and the Congressman.
- Community Roundtable at Focus on the Family. Aaron Atwood of Summit Ministries was the speaker. Interaction with dozens of local faith based nonprofit. Had the opportunity to announce the recent policy changes to not discriminate against faith based organizations
- Interaction with and preparation for the Limon prison tour which would be all day Friday.

Brandon:

- Answered phones

- Worked in InterTrac
- Answered emails
- DFAS and ARMY IG cases
- Veteran Walk-in (Mr. Rolsten)
- Requested flash drive for computer (working with HouseCall and Linda)
- Question about Tricare as second payer
- Coordinate with Tony for list of veterans issues

Tony: Out (vacation)

Cassandra:

- Email Correspondence
- Call with KRDO
- Calls with Wesley for Social Media and PRs
- Drafted PR for No on CRs- worked with Andy, Wesley, and Major Tom
- Researched hotels for Dale
- Spoke with Liz about Academy Nominations and the process
- Clippings
- Reading up on Political Speech writing
- Local papers and press
- Monitor Social Media
- Pass the Gavel social media with Wes and Andrew
- Left a bit early- not feeling well 😞

Marcus: In DC

Christa Ruzo | Staff Assistant | Tour Scheduler
Office of Congressman Doug Lamborn
1125 Kelly Johnson Blvd., Suite 330, Colorado Springs, CO 80920
Direct: [REDACTED] | Office Main: 719.520.0055



Tapia, Elizabeth

From: Pope, Brandon
Sent: Tuesday, September 24, 2019 5:16 PM
To: Lamborn, Doug; Lamborn, Jeanie; CO05-District; CO05-DC Staff
Subject: District staff daily reports

Linda: Out (vacation)

Liz:

- Casework tasks
- Phones
- Academy application intake & processing
- Interview scheduling
- Unofficial errand during my lunch hour

Jeff: Not a workday

Brandon:

- Worked in InterTrac
- Answered phones
- Call with Dale, Marcus, Cas WRT Fort Carson
- Call to UCCS, Department of State, and U.S. Embassy in Belgrade WRT constituent stuck in Serbian hospital (UCCS part time professor) – Assistance from Cassie and Liz
- Returned emails and voicemails
- Forward WH tour follow up to Wes
- Attended all staff call
- Forward Tricare response and close case for AD spouse
- Contact with mil/vet rep at Colorado Technical University to update phone roster
- Referral/warm handoff to Teller County official Dan Williams for Woodland Park Constituent
- Confirmed meeting/time for State of the Wing on Wed
- Confirmed meeting for Friday with DoD contractor

Tony:

- Answered constituent calls
- Reviewed/acted on DC promoted casework
- Reviewed/acted on emails in Lamborn attachments
- Updated National Cemetery pictures on common drive (folder PPNC)
- Updated casework in Intertrac
- Attended All Staff call
- Prepped statement for issuing "Legion Act" red line tonight in Woodland Park
- Attending Woodland Park American Legion meeting

Cassandra:

- Email Correspondence
- Social Media Posts and Monitoring
- Call with Wesley RE Media
- Monitor news RE Impeachment Inquiry
- Working on website forms and pages

- Calls with Press
- Formatting statement with James and Wes RE Impeachment Inquiry
- All Staff Call
- Booking trip (with Dale's assistance) to DC in Oct.
- Setting up meetings with local press
- Helped with phones- heavy volume
- Call with Dale about Ft. Carson
- Call with Dee McNutt RE Ft. Carson
- Press Release w/ Wesley

Marcus:

- Conference Call with Washington Office on schedules, major legislation, and district news
- Check in call with Dale
- Ongoing emails and calls on scheduling for Congressman for 2-3 potential items in October
- Watching Fox News reporting of melodrama in Washington on the "Impeachment Inquiry"
- Learning more about Academy nominations process from Liz

Tapia, Elizabeth

From: Tapia, Elizabeth
Sent: Wednesday, September 25, 2019 4:57 PM
To: Lamborn, Doug; Lamborn, Jeanie; CO05-DC Staff; CO05-District
Subject: District Office Daily Reports

Linda: Out (vacation)

Brandon:

- Worked in InterTrac
- Answered phones
- Returned emails and voicemails
- State of the Wing address

Tony:

- Answered constituent calls
- Watched the Congressman speak on the floor
- Reviewed Lamborn Attachment emails
- Attended Colorado Springs CBOC stakeholders meeting (report submitted)
- Updated casework in Intertrac
- Working with Carson Hospital CSM on Pharmacy issue

Liz:

- Academy application intake & processing
- Unofficial errand during my lunch hour
- Interview scheduling
- Phones

Cassandra:

- Email Correspondence
- Press Inquiries
- Reading through Ukraine transcript
- Clippings
- Social Media Posts and Monitoring
- Cut video of Congressman on the House Floor
- Watching Breaking News
- Scheduling with Maggie for Press
- Calls with Wesley RE Social Media
- Calls with Joe RE Talking Points
- Calls with Mrs. Lamborn RE Press
- Tagging WH, McCarthy, House GOP, etc. on social media
- Helped answer phones- heavy in afternoon
- Follow up call with UCCS Provost
- Follow up call with Dee McNutt at Ft. Carson

Tapia, Elizabeth

From: Tapia, Elizabeth
Sent: Friday, October 2, 2020 3:40 PM
To: Clayton, Kathleen
Subject: Daily

- One-on-one with Dale
- Emailed IQ regarding comprehensive casework activity reporting
- General casework (spoke with and corresponded with constituents about their cases; sent PACFs)
- Academy nomination tasks (sending out interview letters, monitoring interview confirmations)
- Unofficial errand during lunch break
- Monitor general inbox & promoted correspondence in IQ
- Assisted with phones

Elizabeth (Liz) Tapia
Senior Caseworker / Academy Nomination Coordinator
Congressman Doug Lamborn
1125 Kelly Johnson Boulevard, Suite 330
Colorado Springs, CO 80920
Desk: [REDACTED]
Main: 719-520-0055
Fax: 719-520-0840

Jeff:

- Read "This Precarious Moment" book by David Barton and James Garlow in preparation for a conference call with David and Tim Barton concerning the Biblical principles and history of U.S. immigration policy
- FCA board meeting at Cook Communications Ministries. Discussion of church/schools partnerships
- Phone call to Warden Burl Cain concerning First Steps legislation and recommendations for Bureau of Prisons reforms
- Conference call with David Barton of Wallbuilders concerning immigration policy. Introduction to Pastor Mark Gonzales in order to continue faith-community discussions of immigration reforms
- Interaction with Richard Harris about the C/R for Charis Bible College (celebrating 25 years) and working into the program so that we can present it to Andrew Wommack on Saturday
- Meeting with Ben Foley, President of ServeNow and convener of "Friends of Refugees" concerning illegal immigration, border security and conditions, and care of refugees around the world. Also discussed the growing persecution of Christians in India, Modi's rally in TX, and the President's speech at the UN.
- Monitoring news coverage of President's Ukraine transcript, and talking to Joe about our message to faith leaders that are asking about it
- Attended the 40 Days for Life kick-off rally at Centennial Blvd. 80 pro-life constituents present
- Weekly morning prayer at the Centennial corner, and invitations to 20 pastors to join me each week
- Meeting with Dave Snyder of Continental Realty to discuss multi-family housing and opportunities for faith ministry and community development
- ADF webinar update on cases
- Lunch meeting with Randy Valentine of Every Home for Christ
- COS I love you planning meeting at First Pres.
- Phone meeting with Joe
- Variety of correspondence, scheduling, organizing, reading newsletters, etc.
- Fully recovered from sunburn (thank you, God, for aloe vera!)... still suffering from Broncos (may be a season-long ailment)

Marcus:

- Returning call to Sen. Hisey regarding an immigration question he has (voicemail)
- Helping with phones during high volume surge
- Following up on notional scheduling requests for Congressman in early October
- Attending 21st Space Wing State of the Wing Address
- Following news on the "impeachment inquiry"

Elizabeth (Liz) Tapia
Senior Caseworker / Academy Nomination Coordinator
Congressman Doug Lamborn
1125 Kelly Johnson Boulevard, Suite 330
Colorado Springs, CO 80920
Desk: [REDACTED]
Main: 719-520-0055
Fax: 719-520-0840

EXHIBIT 7

Gregg L. Harper

From: [REDACTED] <[REDACTED]>
Sent: Sunday, July 11, 2021 3:35 PM
To: Gregg L. Harper
Subject: Fwd: DOL workshop guide
Attachments: DOLEW-Participant-Guide-2017.pdf

----- Forwarded message -----

From: Pope, Brandon <[REDACTED]>
Date: Tue, Sep 3, 2019 at 3:40 PM
Subject: DOL workshop guide
To: [REDACTED] <[REDACTED]>

As discussed.

Gregg L. Harper

From: [REDACTED] <[REDACTED]>
Sent: Sunday, July 11, 2021 3:36 PM
To: Gregg L. Harper
Subject: Fwd: graphic designer position and other resources

----- Forwarded message -----

From: Pope, Brandon <[REDACTED]>
Date: Tue, Sep 3, 2019 at 4:27 PM
Subject: graphic designer position and other resources
To: [REDACTED] <[REDACTED]>

<https://www.cia.gov/careers/opportunities/support-professional/graphic-designer.html#job-details-tab1>

<https://www.fbijobs.gov/career-paths/arts-communications>

<https://www.fbijobs.gov/career-paths/special-agents/eligibility>

<https://www.secretservice.gov/join/careers/apt/>

<https://www.fedshirevets.gov/>

<https://www.fedshirevets.gov/job-seekers/veterans-preference/>

<https://www.fbijobs.gov/veterans>

EXHIBIT 8

Gregg L. Harper

From: [REDACTED] <[REDACTED]>
Sent: Sunday, July 11, 2021 3:37 PM
To: Gregg L. Harper
Subject: Fwd: quick question

----- Forwarded message -----

From: [REDACTED] <[REDACTED]>
Date: Mon, Oct 7, 2019 at 2:38 PM
Subject: Re: quick question
To: Pope, Brandon <[REDACTED]>

Hey Brandon,
Thanks for asking. I think it went well. He gave me a good description of the office, which basically deals with putting out information to the general Navy population on routine matters. And also engaging with the public on Navy related issues. So they are kind of like a little ad agency, or PR firm.
It all sounded very interesting. We also chatted about my prior military time, and work history a bit and what I could bring to the table.
I think it went well, but I've been through many interviews before, and I can never tell one way or the other how things will turn out.
If nothing else, it was great to talk to an actual person and get some feedback on my application, rather than just a usejobs portal computer response.
You were right about him asking why I wanted to switch it up from nyc, and I gave him my rationale behind a more stable and benefits oriented career over freelance, and also serving my country a bit better with my skills versus selling stuff through commercials or entertainment.
I guess I'll just stand by in the meantime,
I hope you're having a good monday so far...

On Mon, Oct 7, 2019 at 11:22 AM Pope, Brandon <[REDACTED]> wrote:

Good morning [REDACTED]

Did you complete the phone interview over the weekend? If so, how do you believe it went?

R,

BP

From: [REDACTED] >
Sent: Saturday, October 5, 2019 9:08 AM
To: Pope, Brandon <[REDACTED]>
Subject: Re: quick question

Hey Brandon,

Thanks a lot for this feedback, it's very helpful.

Yes, I can certainly be ready to address the possible questions you have mentioned, those are good points to consider.

I hope you're enjoying the mountains.

Best, [REDACTED]

On Sat, Oct 5, 2019 at 12:20 AM Pope, Brandon <[REDACTED]> wrote:

Hi [REDACTED]

Sorry for the delayed response. I am in the mountains right now and don't have the best reception.

I believe the interview questions for that position will be based largely on your background, resume, and portfolio.

You may get questions asking why the Navy or why the DOD but I don't think there will be anything too challenging.

After seeing a few items in your portfolio and hearing about your experience I don't think you have much to worry about.

The good news is that you got an interview. Making it past the computer resume screener is always difficult.

I will be around tomorrow morning if you are still interested in talking.

-Brandon

Sent from my iPhone

> On Oct 4, 2019, at 2:27 PM, [REDACTED] <[REDACTED]> wrote:

>

> Hi Brandon,

> How are you doing?

> I was wondering if I could bug you with a question whenever you get a chance. I just received an email from the Department of the Navy at the Pentagon for a graphics position, and someone there wants to schedule a phone interview with me over the weekend.

> I was wondering if you had any insight on what kind of topics might come up.

> If it's easier to chat over the phone, that works for me, if you're not too busy at the moment.

> All the best,

> [REDACTED]

V V
[Redacted]