

# **EXHIBIT 7**

CONFIDENTIAL

---

Subject to the Nondisclosure Provisions of H. Res. 895 of the 110<sup>th</sup> Congress as Amended

## **Transcript of Interview of Current Staffer 2**

Review No. 21-6998

October 1, 2021

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

OFFICE OF CONGRESSIONAL ETHICS  
OF THE U.S. HOUSE OF REPRESENTATIVES

-----x  
In re: CURRENT STAFFER 2, : OCE Review No:  
: 21-6998  
-----x

Interview of CURRENT STAFFER 2  
Conducted Virtually  
Friday, October 1, 2021  
10:02 a.m. EST

Job No. 403238  
Page: 1 - 109  
Transcribed by: Kevin Kiser

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

1 Interview of CURRENT STAFFER 2, conducted  
2 virtually.

3

4

5

6

7

8

9

10

11

12

13

14 Pursuant to agreement, before Kevin Kiser,  
15 Notary Public in and for the Commonwealth of  
16 Virginia

17

18

19

20

21

22

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

A P P E A R A N C E S

ON BEHALF OF OFFICE OF CONGRESSIONAL ETHICS:

SEAN M. QUINN, ESQUIRE

ANNIE CHO, EQUIRE

HOUSE OF REPRESENTATIVES

425 3rd Street, Southwest, Suite 11100

Washington, DC 20024

202.225.9739

ALSO PRESENT:

CARL HELLANDSJO, TECHNICIAN

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

C O N T E N T S

EXAMINATION OF CURRENT STAFFER 2	PAGE
By Mr. Quinn	7

E X H I B I T S

(Attached to transcript.)

INTERVIEW EXHIBITS	PAGE
Exhibit A    Calendar Notification	22
Exhibit B    Trip Planning Document	27

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

5

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

P R O C E E D I N G S

MR. QUINN: Great, thanks for all. And then I just have a quick little read on myself just for the record.

So today is October 1st, 2021, and we're conducting the interview of Current Staffer 2 by Zoom. Current Staffer 2 Staffer 2 is not represented today speaking as Sean Quinn, investigative counsel at the Office of Congressional Ethics, and I'm here with Annie Cho, also at the OCE.

The witness has been given a copy of 18 USC 1001, and has signed the acknowledgment, and actually while we're on that point, Current Staffer 2, did you have any questions about the false statements act or that acknowledgment form --

THE WITNESS: No.

MR. QUINN: -- that you sent me?

THE WITNESS: Not really --

MR. QUINN: Okay.

THE WITNESS: It's -- it's for the traditional legislative jargon. It was hard, but it was pretty understandable.

1 MR. QUINN: Yeah. I'm sure you're  
2 familiar with the acts of the basics, just that we  
3 have to let everybody know so --

4 THE WITNESS: Sure.

5 MR. QUINN: -- that all statements act  
6 makes it illegal to -- to lie, or make a material  
7 omission to a congress -- congressional  
8 investigator like myself.

9 THE WITNESS: And I just wanted to go --

10 MR. QUINN: So with that being said --

11 THE WITNESS: I'm -- I'm sorry. I just  
12 wanted to point out to I'm here in the office by  
13 myself today, so there's nobody else even in the  
14 -- in our office suite here, so I'm totally alone.

15 MR. QUINN: Okay -- okay. Great.  
16 That's good to know. And then also I'll say  
17 thanks very much for your time this morning. We  
18 appreciate it, I'm sure you're -- I'm sure you're  
19 busy especially now in Congress, so it's pretty  
20 much appreciated. And then also throughout our  
21 time talking, if you have any questions for me  
22 feel free to stop me or if you don't understand



1 the question that I've asked you, I can repeat it  
2 or reword it, or if you just need a break for  
3 water or bathroom. Feel free to stop me at  
4 any point.

5 THE WITNESS: Thank you so much.

6 MR. QUINN: And then, yeah -- and then,  
7 lastly, since we do have somebody transcribing  
8 everything we're saying, let's just try not to  
9 talk over each other. Makes it very hard to type  
10 when two people are talking at the same time, so I  
11 'll do my best and -- and then also, Kevin, if we  
12 start talking too fast, just -- just let us know  
13 and slow us down.

14 And -- and I think with that I'll just  
15 ask, normally we start with a couple of questions  
16 just kind of about what you did, if anything, to  
17 prepare to talk to us today, so I don't know if  
18 you spoke to anybody else or maybe looked at some  
19 documents or look back to -- back at any notes.

20 BY COUNSEL FOR THE OFFICE OF CONGRESSIONAL ETHICS

21 BY MR. QUINN:

22 Q Was there anything at all that you did

Transcript of Interview of Current Staffer 2

Conducted on October 1, 2021

8

1 today to, or that you've done recently to prepare  
2 for this interview?

3 A No. The only thing that I really --  
4 really did was contact the -- the attorney that  
5 the office had said was available, made a phone  
6 call, but the individual call was never returned  
7 --

8 Q Okay.

9 A -- so not really, no.

10 Q Okay. And was that -- that was Rob  
11 Walker?

12 A Yes.

13 Q Okay. Great. And then -- and you  
14 haven't talked to anybody else about -- about  
15 those CE interview?

16 A The only one I think I've ever talked to  
17 is my fellow District Director. I mentioned it to  
18 her that I was going to be interviewed, Jean  
19 Potter, and then I also mentioned it to my former  
20 boss who you've interviewed before a [Former Staffer 1].

21 Q Okay. Great. How about Representative  
22 Mooney or Michael Hough? Have you talked to

1 either of them about this?

2 A I -- I did mention to them that I --  
3 that was being Monday when I first found out about  
4 it, Michael told me that he was actually in the  
5 room with the congressman at the time so I'm  
6 assuming they're both aware of this taking place  
7 today.

8 Q Okay. Great. And did Michael say  
9 anything to you about the interview or just noted  
10 that you'd be participating?

11 A Yeah. Yeah. I mean, basically it was  
12 just, you know, he resent out to the -- the one  
13 form about keeping our records and everything and  
14 then he also, you know, just said, Hey, be  
15 straightforward kind of thing, you know, pretty  
16 vague, nothing. No -- no questions really at all.  
17 So --

18 Q Okay -- okay. Good to know. Great.  
19 Then why don't we talk a little bit just about  
20 your background and -- and what you do for  
21 Representative Mooney.

22 A Uh-huh.

1           Q     Can you tell me when you started working  
2 for Representative Mooney?

3           A     It would have been the end of February  
4 2019, that I came onboard here to be a district  
5 representative in the Martinsburg office to kind  
6 of work on issues in the eastern part of the  
7 Second District of West Virginia. And then as my  
8 time here has evolved because of my previous  
9 history and work, I was given a title of Economic  
10 Development and Outreach to liaison. So that's my  
11 -- my role now and since [Former Staffer 1] left in June, Jeanne  
12 and I have assumed sort of core District Director  
13 roles.

14                     I'm working with the -- the field reps  
15 and she's working with the case management stuff  
16 that goes on with the office primarily. So that's  
17 kind of been the -- the split of duties, of  
18 course, with the district this size, the  
19 Charleston office, it's six hours away from the  
20 Martinsburg office and so sometimes logistics can  
21 be a little difficult, but it is what it is.

22           Q     Right. And I think you said that you

1 are -- you are in the Martinsburg office; right?

2 A That's correct. Yeah. I live in  
3 Jefferson County, West Virginia.

4 And again, my background, I was involved  
5 with the Appalachian Regional Commission for 17  
6 years in DC, and prior to that, I'm -- I'm  
7 originally from Ohio and worked with the  
8 Appalachian Program in Ohio both at the -- the  
9 regional and state level so, I don't know, full  
10 background was local economic development, rural  
11 development in Appalachian, so that's why I  
12 applied for the job to begin with it kind of -- it  
13 kind of fit some of the things I used to do and  
14 kind of gave me something during my, I guess, semi  
15 retirement.

16 Q Right. Okay. Yeah. Sounds like a good  
17 -- like a good fit.

18 A Yeah.

19 Q Can you -- other than just having that  
20 general background that was kind of a good fit for  
21 the position. Can you tell me how you came to  
22 work for Representative Mooney?

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

12

1           A     In all honestly, I saw an ad in the  
2     Martinsburg Journal, I mean, the old-school stuff  
3     and, like, you know, no LinkedIn or any other  
4     sort of on -- on-site sort of job recruitment is a  
5     traditional old ad and the paper that I responded  
6     to and, you know, applied for the job back, it's  
7     probably January of '19 and, quite frankly, the  
8     reason I decided to work with the congressman  
9     because I'm a conservative person myself, we  
10    aligned pretty well with views on a whole host of  
11    things that tend to be more conservative in  
12    nature, so I -- I -- I couldn't see myself working  
13    for somebody that didn't agree with on most  
14    issues.

15           Q     Okay. Let's go through just quickly a  
16    little bit of the reporting structure in your  
17    office --

18           A     Uh-huh.

19           Q     -- who did you report to?

20           A     Well, again, since [Former Staffer 1] left the office  
21    in June, I really report to Mike -- Michael  
22    Hough's and -- and Jean Potter and I try to

1 coordinate our -- our work together as much as we  
2 can, we talk on a fairly regular basis as well.

3 Q Okay. And Jeanne is in the -- the  
4 Charleston office?

5 A That's correct. That's correct.

6 Q And then who reports to you?

7 A Primarily, Susie Acevedo as a district  
8 rep out of the Charleston office and then Rhett  
9 Dusenbury is kind of a -- he's out of Elkins and  
10 so he's -- he's not on either office, he's sort of  
11 operates out of his homes for that central part of  
12 the -- and then I guess sort of technically the  
13 manager of the Martinsburg office, and Jeanne's  
14 the manager at the Charleston office, too. So --

15 Q Okay. Great. So -- so that's the  
16 official side. Have you ever worked or done any  
17 work for the campaign?

18 A A couple of minor things. I picked the  
19 congressman up last summer, not this summer, but  
20 the previous summer on my off time I've done,  
21 like, a parade the first year in Ripley and -- and  
22 Hurricane and even when I picked up the

1 congressman that was on, you know, off time, too.  
2 So there are a very few campaign activities, quite  
3 frankly. Most of it, it's been visits, and there  
4 had been very few of those, quite frankly, too,  
5 so, you know, stops in the district and stuff.

6 Q And when you say picked up the  
7 congressman, you just -- you mean you drove him to  
8 and from the event?

9 A Yeah. Yeah, he was at a --

10 Q Okay.

11 A -- at a meeting in -- in Southwestern  
12 Pennsylvania back in I think it was July of '20  
13 and it was, I think it was a congressional  
14 Republican event meeting and the gentleman that  
15 usually does that work his mother-in-law passed  
16 away and they needed somebody to go pick the  
17 congressman up and so I said sure I can do it.  
18 And then instead of being paid as a normal process  
19 of reimbursement, actually, the congressman paid  
20 me with a personal check, so --

21 Q Okay.

22 A -- for the mileage and everything.



1 Q Okay. So in that case, instead of --  
2 instead of submitting a mileage claim to the -- to  
3 the campaign the congressman paid you directly for  
4 the -- for the mileage to you?

5 A That's my recollection.

6 Q Okay. Do you know -- do you know if he  
7 then submitted a mileage request?

8 A I have no --

9 Q -- or do you know how that worked?

10 A I have -- I have no idea, yeah. I have  
11 no idea how that worked.

12 Q Okay. And then you -- you had mentioned  
13 that the person who would normally do that had a  
14 family emergency, who -- who is the person that  
15 would normally do that?

16 A His name is Ranier Kissel. Ranier has  
17 since retired at the end of last year but he  
18 typically did at least some of -- of the driving  
19 for the congressman, you know, depending upon the  
20 circumstances and situation.

21 Q Okay. And did he have a title with the  
22 campaign or the official office?

1           A     You know, I'm sure he did. I'm not  
2     recalling exactly what it was. He was a part-time  
3     employee when I came on board and then also did --  
4     he -- he did more things on the campaign side, too,  
5     see, he was kind of split in nature, so I -- I  
6     really can't with -- with full extent of any real  
7     knowledge sort of say how that worked. I just  
8     knew he was an employee.

9           Q     Okay. Got you. Okay. We can -- we'll  
10    start talking about some of the more specific  
11    things that we're looking at. One of the things I  
12    wanted to ask you about is a trip from this year  
13    in early August. I think it was August 2nd to  
14    August 5th. Do you -- do you know what trip I'm  
15    talking about?

16          A     I know I met the congressman and his  
17    wife and daughter in Moorefield High School for an  
18    event there the Governors Art Caravan, I believe  
19    it was called and we -- I staffed him at that  
20    event and then we had lunch afterwards in  
21    Moorefield.

22          Q     And that was on the -- do you -- do you

1 recall that day that was the second?

2 A I believe it was the second, yeah. In  
3 fact I had just submitted my expense report and  
4 had that on there. So I could look that up for  
5 you real quick if you like.

6 Q That's fine I actually I have a document  
7 or two we can look out to kind of --

8 A Okay.

9 Q -- nail down dates if we need -- need to  
10 do that. But my impression from other folks that  
11 we've talked to and -- and document that I've seen  
12 is that it was like a -- it was a couple of day  
13 trip maybe or there at least a few things plan,  
14 for example, there was a visit to -- I'm not sure  
15 I'm saying this correctly Blennerhassett Island.  
16 Is that how you say that?

17 A Yeah. Yeah. That's how you say it.

18 Q Okay. Okay.

19 A That -- that was my understanding --

20 Q Do you --

21 A -- too, Sean -- I'm sorry.

22 Q Okay. Go ahead.

1           A     Charleston after that point and  
2     goodness, I think the congressman was leaving out  
3     of Charleston and his wife and daughter was  
4     staying or something like that, but I wasn't sure  
5     and I know they were trip up there to Wood County  
6     and -- and Blennerhassett Island, this historic  
7     site, if you will. I don't know if you -- how  
8     much you get into the US history, but it was --  
9     there's a book called The Pioneers that -- that  
10    I've read that sort of documents, the settling of  
11    the Northwest Territory, and Blennerhassett was  
12    part of that discussion. So --

13           Q     -- anyway, I'm going off in other woods  
14    a little bit --

15           A     Right.

16           Q     But it's -- it's the right book.

17           A     My lights have just shut off here so I  
18    was just trying to --

19           Q     Okay. And Blennerhassett Island just so  
20    I can get the geography down in -- in Wood County,  
21    is --

22           A     Yeah. It's -- it's on Ohio River.

1 Q Okay.

2 A I believe it would be considered Wood  
3 County, right. Parkers -- Parkersburg Wood  
4 County, correct.

5 Q Okay. And there was also part of this  
6 trip, was a -- was there a meeting with or  
7 interview with folks in the -- at the Parkersburg  
8 newspaper, do you recall that?

9 A That was my understanding that that was  
10 going to take place whether it took place or not,  
11 I'm not sure, but my understanding was they were  
12 -- they were setting something for that to take  
13 place.

14 Q Okay. So I think we're talking about  
15 the same trip or at least we --

16 A Yeah.

17 Q -- we believe --

18 A I believe we --

19 Q -- aired that out. Are -- were you  
20 involved in planning any of the various stops on  
21 that -- that kind of multi-day tour?

22 A No, I don't think I did. Like I said,

1 they had already said I picked up at Governor's  
2 Art Caravan stop and I was just asked to staff him  
3 there at that event, so that was the only role I  
4 really played in that process. Yeah. Typically  
5 when -- when there are visits by the congressman  
6 to the -- to the district in the past, [Former Staffer 1] had  
7 handled those. And since his departure, I would  
8 work on things in this part of the district and  
9 then the Charleston office would work on, you  
10 know, those types of trips as well.

11 Q Okay, there were two other stops that  
12 I've seen kind of associated with multi-day today  
13 trip that I wanted to ask you about and see if --

14 A Uh-huh.

15 Q -- you knew anything about it. If you  
16 don't know anything about it just say so. One was  
17 a meeting with somebody named Matthew Herridge.  
18 Do you know -- are you familiar with that meeting  
19 or do you know who that is?

20 A No, I don't believe so.

21 Q Okay.

22 A Name doesn't ring a bell.

Transcript of Interview of Current Staffer 2

Conducted on October 1, 2021

21

1 Q I had -- oh, sorry. Go ahead.

2 A No, I just said that -- that name  
3 doesn't -- doesn't sound familiar to me.

4 Q Okay. Let's see. I had -- if we can  
5 pull up -- let's see. Carl, if we can pull up tab  
6 2. So I was asking you about it, Current Staffer 2, just  
7 because we had some folks produce some documents  
8 to us and -- and one of them was a calendar invite  
9 with -- or setting up a meeting with this  
10 individual named Matthew Herridge, and it looked  
11 like, from the calendar invite, you were the point  
12 of contact for him, so I'll -- I'll just show that  
13 to real quick and you can --

14 A Yeah, please do. Because maybe I'm just  
15 forgetting something.

16 Q Yeah. Let's see. So just for the  
17 record, so that we can tell where -- oh, and,  
18 Carl, you can mark this as Exhibit A. And this is  
19 a calendar notification on Gmail titled, meet with  
20 Matthew Herridge at -- on Thursday, August 5th,  
21 2021, 3:30 to 4:30, and it looks like this  
22 particular update was sent on July 30th, 2021, at

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

22

1 3:05. And I don't know or -- I don't know if this  
2 went to you or not, Current Staffer 2. This was from another  
3 individual.

4 (Exhibit A was marked.)

5 A Yeah. I --

6 Q But it says, and so you can see that,  
7 Current Staffer 2 is --

8 A Yeah.

9 Q -- contacting Matt Herridge to set up a  
10 time and location.

11 A I think there was some --

12 Q Do you recall that or --

13 A -- there was some going back and forth  
14 about some of the meetings, and I kind of bowed  
15 out of setting things up like that because I had  
16 no idea who these people were, so I think other  
17 people kind of picked up the ball. I think that  
18 may have been initially their thinking in the  
19 office, but I don't recall that e-mail. I can  
20 look in my -- my personal Gmail to see if I have  
21 it. It's -- I see it's July 30th. Like I say, I  
22 -- I did not set up any meetings. I never



1 contacted Matt --

2 Q Okay.

3 A -- Herridge, to my recollection, at all.

4 Is he a reporter --

5 Q Okay.

6 A -- or do you know?

7 Q I think he's just a -- a private  
8 individual, not a reporter.

9 A Well, I know there was talk about Burger  
10 King owner or something like that. Is -- is that  
11 that --

12 Q That's -- that's who I think it is.  
13 Yeah.

14 A Okay. Yeah. That -- [Current Staffer 1]  
15 probably is the one who made the -- find -- made  
16 the appointment with him, I'm thinking.

17 Q Okay.

18 A If you go to the Charleston office.

19 Q Okay. Got it. Yeah. I'm sure these  
20 things are -- are pretty fluid.

21 A Yeah.

22 Q So I had just seen this, so I thought

1 you might be the person to ask about it, but we  
2 will -- we can move on from that.

3 A And that's not -- that was my  
4 understanding, that that -- and that he was either  
5 an influential Republican or a donor or something,  
6 but I had -- I had no -- no clue about that and  
7 who set what up when.

8 Q Okay.

9 A I know they had -- they had talked about  
10 me, as I recall, contacting some folks, and it's  
11 like, I don't know anybody over there in that part  
12 of the states, so, you know.

13 Q Right. And -- and then is -- so  
14 Blennerhassett Island and Wood County and  
15 Parkersburg are -- they are not in Representative  
16 Mooney's district; is that right?

17 A They -- they -- they are not, no. No.

18 Q Okay.

19 A Wood County is north of -- of the  
20 border.

21 Q Okay. Do you recall, as planning for  
22 this -- these trips were going on, if there was

1 any discussion about that, especially about the  
2 fact that the -- these stops weren't in  
3 Representative Mooney's district?

4 A And -- and this is an assumption on my  
5 behalf. I know, again, the -- the newspaper has  
6 coverage in parts of the district, you know, down  
7 into Wirt County, Calhoun County probably, Roane  
8 County maybe, also Park -- Parkersburg --

9 Q Okay.

10 A -- is kind of a more central city for  
11 that part of the state. So there would be  
12 coverage from that paper, but, you know, the fact  
13 of the matter is with redistricting coming up,  
14 too, I -- I think there was probably -- and,  
15 again, I'm making an assumption here and trying to  
16 just understand the politics of it all. Trying to  
17 get more exposure in that part of the state would  
18 probably be a logical assumption to make.

19 Q Okay. And is that -- that's  
20 representing McKinley's district; correct?

21 A That's correct, yeah.

22 Q Okay. Okay. One other stop that looks

1 like it was on the schedule for this August 2nd to  
2 August 5th period was a trip to The Greenbrier. I  
3 believe there's a dinner at The Greenbrier. Does  
4 -- does that ring any bells for you?

5 A Yeah. My understanding was, after the  
6 Moorefield High School event, that they were going  
7 to be going down there for a -- a late -- like,  
8 early dinner, I think, perhaps, and then going to  
9 Charleston that night. That was my recollection  
10 of that day's sort of itinerary.

11 Q Okay. Do you know any -- anything about  
12 the purpose for that -- that dinner?

13 A Boy, I probably did at the time. I'm  
14 trying to recall exactly what -- you know, who it  
15 was with and why, and I -- I -- I just don't  
16 remember, to be honest.

17 MR. QUINN: We can -- there's one other  
18 document I can show you, and I can let you kind of  
19 look through it. It's -- and it might refresh  
20 your recollection a little bit. Let's see. Carl,  
21 if you can pull up tab 1 and mark that as Exhibit  
22 B.

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

27

1 (Exhibit B was marked.)

2 THE WITNESS: And that's the wrong --

3 MR. QUINN: Yeah. I think we've got the  
4 wrong document up, Carl.

5 THE WITNESS: Yeah.

6 MR. QUINN: Or we had it for a second.

7 THE WITNESS: Yeah, we did.

8 MR. QUINN: And then it was --

9 A That looks like it's a typical planning  
10 document we use on trips and everything.

11 BY MR. QUINN:

12 Q Okay. I've seen them referred to as  
13 LBLs. Is that -- does that mean --

14 A Line by lines.

15 Q -- line by lines?

16 A Yeah. Yeah, exactly.

17 Q Okay. So if you want to take -- this is  
18 a couple -- or a two-page document. Carl, can you  
19 give Current Staffer 2 control of the document? And then if you  
20 want to take a minute or two just to look through  
21 it. I'll say for the record, this is a -- as Current Staffer 2  
22 said, a line by line, basically agenda or calendar

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

28

1 of events from August 2nd to August 5th, on the  
2 second and third page, and at the bottom, it notes  
3 that it was revised on 8/2/2021. And we -- Current Staffer 2,  
4 just so that you see, at the bottom right, we  
5 apply our own numbering system to documents --

6 A Sure. Sure.

7 Q -- so that we can identify them later.

8 So for the record, this document has a Bates Stamp  
9 of WB\_0210.

10 A All right.

11 Q Okay. Yeah. Current Staffer 2, if you want to take a  
12 minute to look at that and then just let me know  
13 when you're -- when you're done scanning it.

14 A Yeah. Yeah. I -- I think that's a fair  
15 and accurate depiction of the trip. There may  
16 have been, as I recall, maybe a last-minute  
17 inclusion of some small group. It was -- it was  
18 something Susie had put together. I'm trying to  
19 think what the group would have been even --  
20 that's not listed there. I -- I think it was sort  
21 of a -- a last minute addition, either the evening  
22 of the 3rd or the 4th, but other than that, it's

1 -- I think it's a pretty accurate description. I  
2 -- the -- the -- as far as The Greenbrier dinner,  
3 I don't know who the Lamptons are.

4 Q Okay.

5 A I have no idea who they are. No matter  
6 --

7 Q Okay. Yeah, that's what I was --

8 A -- what (inaudible) occurred, quite  
9 frankly. I'm assuming it did, but I don't even  
10 know whether it actually did or not.

11 Q Okay. You said you're not sure if it  
12 occurred?

13 A Right. I'm -- I'm not even sure if it  
14 occurred.

15 Q Okay.

16 A I'm assuming it --

17 Q Sorry. It just cut out. Okay. What  
18 I'll -- I'll ask a couple other just kind of  
19 general questions. If you actually scroll back to  
20 that first page.

21 A Yeah.

22 Q So it looks like -- I can see that

1 there's a column for who will be staffing  
2 Representative Mooney at these events, and it  
3 looks like you staffed him at the first event,  
4 like you said, that Moorefield art show.

5 A Right. Right.

6 Q And then do you have any idea how  
7 Representative Mooney got from Moorefield then to  
8 The Greenbar -- brier later that afternoon?

9 A Yeah. They -- they had the family van.  
10 Matter of fact, I -- when I -- I met him outside  
11 of the high school. That's what they were -- they  
12 drove up in that van from their home. They had  
13 driven up then, and that was my understanding.  
14 They'd be driving that -- to The Greenbrier and  
15 then up to Charleston.

16 Q Okay. Okay. And then it looks like --  
17 right. They went to Charleston that evening to  
18 stay in a hotel, and then the next morning, for  
19 the first event, which is a meet with Charleston  
20 City police officers. [Current Staffer 1] is staffing  
21 Representative Mooney. That's [Current Staffer 1]?

22 A That's correct, yes.



Transcript of Interview of Current Staffer 2

Conducted on October 1, 2021

31

1 Q Okay. Okay.

2 A Yeah. My -- my understanding --

3 Q Okay.

4 A -- is [Current Staffer 1] pretty much staffed him the  
5 whole time he was there. Once he got to  
6 Charleston, he was with him most of the rest of  
7 that trip, he and the fam -- he and -- and -- with  
8 the congressman and his family.

9 Q Okay. All right. And then, if you look  
10 at this page that we're on right now, at 11  
11 o'clock on Wednesday the 4th, there's a tour of  
12 Gritt's Farm in Buffalo, West Virginia.

13 A All right.

14 Q That -- now, by Wednesday, we are in  
15 Representative Mooney's district; is that -- is  
16 that correct? Buffalo, West Virginia?

17 A I -- I think it is. Again, even though  
18 it says I was -- details from me, actually [Current Staffer 1]  
19 took care of all that stuff, is my understanding.  
20 Because, like I say --

21 Q Okay.

22 A -- my familiarity with that part of the

1 district is very minimal.

2 Q Okay. Got you. So you don't know  
3 anything about -- or -- or do you know anything  
4 about the tour of Gritt's Farm?

5 A No. I never -- I never even heard of  
6 Gritt's Farm until -- until this event, so I -- I  
7 really don't know much about it at all, to be  
8 honest.

9 Q Okay. Okay. And then I'll ask first:  
10 Specifically for this trip, do you know if -- once  
11 they drove down to Charleston with the family car,  
12 was -- is that the vehicle they used for the --  
13 the rest of that weekend, or would -- would [Current Staffer 1]  
14 have been driving them? Do you know how that --  
15 that would have gone?

16 A I -- I don't know for certain. My -- my  
17 impression was -- was that they were going to  
18 drive separately and that [Current Staffer 1] would -- would  
19 follow them, but again, I -- I just don't know if  
20 that's what actually occurred or not.

21 Q Okay. Great. I think -- I think that's  
22 probably all the questions that I have for you on

1 this document. So, Carl, you can -- you can pull  
2 that down. And then, while we're talking about  
3 driving in general, does -- well, when  
4 Representative Mooney is -- is in the district or  
5 -- or in the state, does he have somebody that  
6 normally drives him? Does he have, like, a driver  
7 or --

8 A Typically, when -- again, prior to the  
9 end of last year, Rainer would often do -- Rainer  
10 Kissel would often do a lot of the driving. Not  
11 all the time. It was kind of hit and miss, but --  
12 but Rainer would, on occasion, take him to  
13 Washington, given the proximity of the residence  
14 to the -- to the Capitol. So he would sometimes  
15 do that. He would sometimes do things in the  
16 district for the -- for the congressman. Sometime  
17 make runs to airports, you know.

18 Rainer was sort of a do-all kind of guy,  
19 you know, the type of guy I guess the congressman  
20 likes to have around to -- to -- sort of  
21 multifaceted in nature, so -- but then at the  
22 other times, he would drive. I know on a -- on a

1 trip I made with him -- I guess it was earlier  
2 this year.

3 We met on the way to -- to Moorefield,  
4 and then off into Seneca Rocks in the -- in the  
5 district there, too, where he drove because he was  
6 going somewhere else after that and I was -- had  
7 an intern with me, and so the -- the young guy who  
8 was the intern was in my car and the congressman  
9 was driving separately, so we make several stops.

10 But there are other times -- like  
11 earlier this year, there was a Saturday event at  
12 Jane Lew with the -- the Volunteer Fire  
13 Department, and he had been in the district, and  
14 this was kind of on the -- on the back end of the  
15 -- of a trip where I drove to Jane Lew and then  
16 drove he and a -- and a -- I want to say at least  
17 a -- one staffer back to the -- back to the  
18 eastern part of the state. So that would --

19 Q Okay.

20 A Say March, maybe. Something like that.

21 Q Okay. And then I just want to circle  
22 back quickly. I know you talked about that --

1 that one campaign event where you had either  
2 picked up or dropped off the congressman and --  
3 and he reimbursed you --

4 A Yeah.

5 Q -- for that mileage personally. Do you  
6 know if he did that with other staffers or if that  
7 -- if that was common?

8 A My -- and, again, that time -- because  
9 it was such an unusual event for me, but there had  
10 been originally talk about being paid in gift  
11 cards, and then a determination was made that that  
12 was no longer an appropriate tool to use for such  
13 reimbursements. And so that's where it came back  
14 to him writing a -- a personal check to me for the  
15 mileage that I accrued that day. That --

16 Q Okay.

17 A -- was my understanding of how that  
18 worked, anyway.

19 Q Okay. And do you -- do you recall when  
20 that kind of policy changed happen, when -- when  
21 it was decided that gift cards shouldn't be used  
22 to reimburse staffers?

1           A     Again, if my memory is correct, that was  
2 either, like, July or August of 2020. And so it  
3 -- it probably would have been right around that  
4 period of time because, again, when that was  
5 initially talked about, you know, even after the  
6 fact, as I recall, that I was going to get  
7 reimbursed with -- with a gift card. And then  
8 they decided, no, that was not appropriate. So,  
9 again, at the end of the day, it kind of became a  
10 personal check being the reimbursement. It was --  
11 they say it was at the Nemacolin Resort there in  
12 Southwestern Pennsylvania. I know it was --

13           Q     Okay.

14           A     -- it was -- it was an event for  
15 Republican members that they had planned on this,  
16 like, I guess, on a Friday evening.

17           Q     Okay. Just on the point of -- of those  
18 -- of those gift cards, had -- had you been ever  
19 -- had you ever been reimbursed, prior to that  
20 policy change, with a gift card?

21           A     Not that I recall. No.

22           Q     Okay. Do you know -- do you know of

1 anybody that was or do you recall any particular  
2 instances of that happening?

3 A Specifically, no. It's just my  
4 understanding was -- was that was kind of the --  
5 the policy of the camp, was to use gift cards as a  
6 -- as a tool for reimbursement when things could  
7 not be written off as some sort of work-related  
8 mileage. But as to -- it's specific individuals,  
9 you know, Rainer comes to mind as a possibility.  
10 Again, I don't even know there for sure whether he  
11 was actually ever reimbursed in that way or not.  
12 I just don't know.

13 Q Okay. I just want to make sure I  
14 understood what you meant there. So you said the  
15 gift card would be used -- and correct me if I'm  
16 wrong. You said the gift card would be used to  
17 reimburse somebody if it was determined that  
18 mileage or something couldn't be written off as a  
19 -- as a work expense?

20 A That's correct. Yeah. That was -- that  
21 was before they changed --

22 Q Okay. Had you --

1           A     -- what the policy was, yeah. I never  
2 saw it written down --

3           Q     And when you say --

4           A     -- or anything like that, but --

5           Q     Okay. And when you say work event --  
6 sorry, work reason, do you mean like official  
7 congressional work --

8           A     Right.

9           Q     -- as opposed to campaign -- as opposed  
10 to --

11          A     Exactly.

12          Q     -- campaign work?

13          A     Exactly.

14          Q     Okay. Okay. And then just quickly, on  
15 Rainer Kissel, you said that he -- he left -- can  
16 you remind me when -- when he stopped working for  
17 the -- for the member?

18          A     My understanding was it was the end of  
19 last year, so it would have been December of 2020.

20          Q     Okay. And do you know why he left?

21          A     Rainer's, I think, in his seventies, and  
22 he had got his five years and so he was eligible



1 for a modest pension at that point, is my  
2 understanding. And -- so, yeah. Yeah. He just  
3 --

4 Q Okay.

5 A -- wanted to -- to -- and he -- I -- you  
6 know, I think he still occasionally does some  
7 things for the congressman, you know, just on a  
8 personal basis. But he's not an official employee  
9 anymore.

10 Q Okay. I think that's everything I have  
11 for that early August trip. Let me just look  
12 quickly and then I can move on. One thing I will  
13 ask you, just about that trip generally: Do you  
14 know -- were you involved in any of the payments  
15 for either hotels or meals on that trip, or  
16 seeking reimbursement for those?

17 A Yeah. The only thing that I was seeking  
18 reimbursement for was for that lunch in  
19 Moorefield. Matter of fact, again, it's on the --  
20 the -- the -- my recently submitted expense  
21 report, where I paid for both mine and the  
22 congressman's lunch.

1 Q Okay. And that was -- that was a  
2 submission to get reimbursement from the MRA?

3 A Yeah. My -- as an official function.

4 Q Not --

5 A Yeah. Yeah. It's typical --

6 Q Official. Yup. Yup.

7 A -- reimbursement process for that trip.

8 I --

9 Q Yeah. I just mean I'm -- sorry. Go  
10 ahead.

11 A No. I just -- on that particular visit  
12 I -- I claim mileage and that lunch.

13 Q Okay. Yeah. I just meant -- I wasn't  
14 being clear. I just meant it was an official  
15 reimbursement as opposed to a campaign  
16 reimbursement?

17 A Correct. Right. That's my -- that's  
18 what I understood that to be what you were asking,  
19 yes.

20 Q Okay. And then, lastly, on that trip,  
21 are you -- are you aware of any communications  
22 with or discussions about addressing the trip with

1 the ethics committee?

2 A I'm not following what you're asking, to  
3 be honest, Sean.

4 Q I -- I'll give you a little -- I'll give  
5 you a little background. There was -- shortly  
6 after that trip -- I'm sure you get these updates  
7 from the ethics committee about certain issues  
8 that they want to address or -- or raise for  
9 members and staff. Sometimes they're referred to  
10 as pink sheets. And there was an e-mail sent out  
11 by the ethics committee shortly after -- it was a  
12 few weeks after this trip, that clarified rules  
13 about members making official visits to other  
14 districts, to other members districts. In  
15 particularly it was focusing on this idea of  
16 redistricting happening and --

17 A Right.

18 Q -- visiting districts that may become  
19 part of your district. Does that ring any bells?  
20 Were there any conversations about -- about that  
21 ethics guidance or conversations --

22 A With the congressman?

1 Q -- with the ethics committee --

2 A With the congressman?

3 Q -- or -- or with anybody in the office.

4 A The -- the only thing that we've talked  
5 -- and this really wasn't so much related to that  
6 trip it's just the idea that, like, I attended,  
7 like, a public hearing on redistricting in Keyser,  
8 which is technically outside of the district, but  
9 very close to the district, and it was a regional  
10 meeting and so it was like sort of a justified  
11 thing.

12 But that -- the person that manages so  
13 -- sort of the fiscal affairs, [Current Staffer 3], was  
14 expressing concern that staff be aware that  
15 out-of-district travel is being scrutinized very  
16 closely and -- and you need to be aware of those  
17 things, and -- and, you know, just, you know, be  
18 -- be mindful of those things. And that is -- you  
19 know, unless there's a really good reason to do  
20 it, it probably should be avoided. That was kind  
21 of a lot, but, yeah --

22 Q Okay.

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

43

1           A     -- the specific things from -- from the  
2 ethics committee, no. I -- I -- I really don't  
3 know much about that.

4           Q     Okay. Do you remember when that  
5 conversation with [Current Staffer 3] was?

6           A     I didn't actually talk to [Current Staffer 3] about it,  
7 but this was through Jean. Jean had talked to him  
8 about it and she -- she had mentioned it to me  
9 several times, you know, between, you know, August  
10 and September. You know, that's been kind of a  
11 theme for -- for her and the staff to -- to, you  
12 know, just be cognizant of those things, and --  
13 and to -- to have good rationale for -- for visits  
14 like that.

15          Q     Okay. Got you. Yeah. It sounds like  
16 that timing probably matches up with the ethics  
17 committee notice so that's --

18          A     Yeah.

19          Q     -- that makes sense. So that's --

20          A     I'm sure that's where [Current Staffer 3] was probably  
21 getting that from and recognizing his, you know,  
22 sort of cautious red flag, if you will, to those

1 types of visits and everything. Right.

2 Q Right. Right. Okay. Great. Then I  
3 think we're done talking about that trip. I have  
4 sort of a -- I don't want to call it a laundry  
5 list because it's not particularly long, but a  
6 couple different items that we can hit --

7 A Sure.

8 Q -- that I'll ask you about and you may  
9 know nothing about them, and that's fine, you can  
10 just let me know. But if something rings a bell  
11 just -- just let me know and we'll kind of stop  
12 and -- and talk about it a little bit more. The  
13 first thing I want to ask you about, there was a  
14 -- I believe, a trip in March of this year to  
15 Aruba that the member took with his family. Are  
16 you familiar with that trip or do you know  
17 anything about it?

18 A Not really. No. I -- I may have heard  
19 it in conversation that they were taking a  
20 vacation, and I don't even recall much of that.  
21 So, yeah, very gray, my background on trips to  
22 Aruba.

1           Q     Okay.  And then I -- I know you started  
2     in February of 2019 so you probably won't be  
3     familiar with this, but there was a celebration in  
4     2018 of the congressman's birthday that happened  
5     on Capitol grounds, on the speaker's balcony.  Do  
6     you know -- do know anything about that birthday  
7     celebration --

8           A     No.  No.  Uh-uh.

9           Q     -- or ever had any conversations with  
10    anybody?

11          A     No.

12          Q     Okay.  Then we'll move on from that,  
13    too.  I think you probably will be a little  
14    familiar with -- so our -- I think you know our  
15    office conducts reviews of members spending and  
16    conduct, and there was a previous review of -- of  
17    some of Representative Mooney's spending and  
18    conduct.  And then we are now conducting this --  
19    this second unrelated review.  So I wanted to ask  
20    you about the -- the first one --

21          A     Sure.

22          Q     -- that happened earlier this year.

1 Were -- were you aware of that review as that was  
2 ongoing?

3 A I mean, you know, once it -- well, I  
4 forget whether it was roll -- I think it was roll  
5 call. One of the -- you know, it became public,  
6 but, you know, in -- in conversations with [Former Staffer 1],  
7 he had mentioned and -- that there was a review  
8 going on and everything. This goes back, you  
9 know, late winter, spring at the very -- at the  
10 very latest, you know, I was aware of it.

11 Probably a little prior to that even,  
12 that there was some conversations taking place  
13 probably maybe even in the late last year perhaps.  
14 I'm not exactly sure when I first became aware of  
15 it, but, yeah, it was probably through [Former Staffer 1].

16 Q Okay. And -- and what had -- what had  
17 [Former Staffer 1] told you about what was going on as far as  
18 you remember?

19 A Yeah. My -- my discussions with him and  
20 -- they were strictly about, like, the trip. I  
21 want to say it was in May of '20, where I set up  
22 meetings for both Michael Hough and the



1 congressman. Although my -- most of my meeting  
2 set-ups were for Michael as opposed to the  
3 congressman. I think Rainer took care of the  
4 congressman's arrangements, as I recall. But I  
5 set up a couple of stops for Michael to make that  
6 were nearby where they were staying. I was a part  
7 of that.

8 Q Okay. And what was -- can you just go  
9 into a little detail about which trip that was,  
10 when it was, and -- and where they were going?

11 A That would've been the one to -- to the  
12 Smoke Hole Resort.

13 Q Okay. Was this a staff -- an all-staff  
14 meeting?

15 A No. No. No. This was just -- my  
16 understanding was -- was that they were going to  
17 the congressman and Michael and -- and perhaps  
18 family were going to be there for the weekend and  
19 -- or a day or two. I'm not sure what -- what the  
20 specifics of the itinerary were, but that -- you  
21 know, we were setting up meetings to go along with  
22 that visit as well.

1 Q Okay. And remind me of the time frame  
2 of that trip again.

3 A I'm thinking it was May of -- of '20.  
4 It sounds right. I could -- I could certainly  
5 find out and look that up if need be. That was  
6 one of the -- the items, as I recall, with the  
7 initial investigation. That was one of the things  
8 that was talked about.

9 Q Okay. I think that I can follow up with  
10 you --

11 A Sure.

12 Q -- if we need to, but I think -- I think  
13 May 2020 serves our purposes for right now. Okay.  
14 And then you -- so you said that that trip was  
15 planned and you were setting up some meetings  
16 related to that trip.

17 A Correct.

18 Q Do you -- do you recall what me -- do  
19 you recall what -- what those meetings were, who  
20 they were with?

21 A Yeah. Yeah. The one meeting was with  
22 the Hampshire County Economic Development

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

49

1 Authority director, her name is Eileen Johnson --  
2 Ms. Eileen Johnson, and she's out of Romney, West  
3 Virginia. And then the second meeting, and the --  
4 again, these are both for Michael. The second  
5 meeting that I set up was with Commissioner Gene  
6 McConnell from Pendleton County, West Virginia.

7 Q Okay. And then back to -- kind of back  
8 to our -- our review. You said that you had  
9 talked to [Former Staffer 1] about that kind of in the context  
10 of he was collecting information about that trip  
11 because the OCE had asked about it?

12 A Yes. Yeah. Yeah. He asked me to go  
13 back through my records to look at e-mails that  
14 I'd had, like, with the scheduler, [Former Staffer 2]  
15 or -- or Michael, or anybody else in that time  
16 frame to -- to kind of corral those, if you will,  
17 and forward those back to him. So that he would  
18 have those as part of what he was putting together  
19 for you-all is --

20 Q Okay.

21 A -- is my understanding. Yeah.

22 Q Right. Yeah. That sounds about right.

Transcript of Interview of Current Staffer 2

Conducted on October 1, 2021

50

1 We worked closely with [Former Staffer 1] on that so -- I'm sure  
2 that was a thankless task for him, collecting all  
3 those documents. So --

4 A I know he put a lot of time into the --  
5 the -- the whole putting things together. Yeah.  
6 I don't know -- it's like I said, I know he was  
7 very busy in that stretch doing things.

8 Q Were there any other particular trips or  
9 items that -- that my office was inquiring about  
10 that you are involved in as far as collecting  
11 documents or providing information?

12 A No. My only -- and, again, this is just  
13 my personal sort of observation. It seemed like  
14 there may have been some confusion with some of  
15 those visits and some of the all-staff --  
16 retreat that we had. I know -- I believe it was  
17 in October of -- of '19 that we had a staff  
18 retreat at Smoke Hole Ranch, that was indeed an  
19 all-staff retreat. And then I want to say --  
20 trying to think when last year's was, it may have  
21 been October, a few days before the election. I  
22 know that -- in Canaan Valley Resort, and -- and

PLANET DEPOS

888.433.3767 | WWW.PLANETDEPOS.COM

1 that was an all-staff meeting as well.

2 So at least in the reporting that I saw  
3 on -- in the publications it looked like there may  
4 have been some confusion as to, you know, what was  
5 what, you know. Because I know there was a visit  
6 that the Congressman made the Canaan Valley in  
7 December of one year and that was different than  
8 that. Then there was also that Smoke Hole Ranch  
9 event that -- that he and Michael went to. Their  
10 visit was, I believe, in like I say, in May of  
11 '20, and -- and we also use that resort as an  
12 all-staff retreat in the fall of '19, I believe.

13 Q Right. Right. So -- great. So  
14 multiple -- multiple stops at the same --

15 A Yeah. Yeah.

16 Q -- at the same spot? Okay. Any other  
17 -- so -- any other conversations with [Former Staffer 1] or  
18 anybody else in the office that -- that you can  
19 recall about kind of collecting information or  
20 documents that reflect --

21 A [Former Staffer 1] would've been in conduit for that  
22 information. And so I was relayed to kind of my

1 primary funnel, if you will, for any information  
2 that would be forward through [Former Staffer 1]. Michael may  
3 have asked me indirectly a time or two, but I  
4 don't even recall that specifically, to be honest.

5 Q Okay. Yeah. I was actually just going  
6 to run through a couple of names real quick and --

7 A Yeah.

8 Q -- and you can tell me if you recall any  
9 specific conversations.

10 A Sure.

11 Q So how about -- how about with [Former  
12 Staffer 2]? I know that she was somewhat involved  
13 in that process as well.

14 A Yes.

15 Q Did you have any conversation with her?

16 A No. I would -- no. I just coordinate  
17 with [Former Staffer 2] primarily through e-mail. We would  
18 have a phone call on occasion, just, you know,  
19 making sure that she got the information that I  
20 was providing or, you know, that, hey, I just got  
21 some e-mails from you, got us to chat about this  
22 because as a scheduler of course, she was taking

1 care of all that stuff and everything. So, yeah.

2 Q Okay. And then how about [Former Staffer 3]?

3 Any conversations --

4 A Yes.

5 Q -- with her about -- about that process?

6 A Just indirect type of things, just an  
7 investigation was underway. Of course, she was  
8 handling some of the -- she was as -- my  
9 understanding is [Former Staffer 3] was both staff and  
10 campaign and that she was handling a lot of the  
11 expenses of the campaign and trying to keep track  
12 of that and it was kind of -- kind of jumbled up a  
13 little bit. [Former Staffer 3] was a young lady, kind of  
14 really had no -- didn't have a lot of experience  
15 doing that kind of thing. And so there was, you  
16 know, I guess some issues or problems with that,  
17 but I -- I wasn't aware of the specific so much.

18 I know she was nervous. If you will,  
19 just trying to handle all those things and  
20 everything. She -- she popped into the office  
21 here on occasion when -- because she would work  
22 over at the congressman's house on occasion, too,

1 and -- and that type of thing in the campaign role  
2 that she played. She'd -- she'd, you know, like I  
3 said be (inaudible) times on occasion in her role  
4 as a -- as a staffer as well, but not a whole lot.

5 Q Okay. And then how about with Michael  
6 Hough? Any particular conversations about the  
7 review or -- or collecting documents?

8 A Nothing in -- nothing in specific  
9 system. He and I that I can recall. I mean, Mike  
10 would -- would send out sort of the notifications  
11 to, you know, save all the documents, save all the  
12 e-mails, you know, be honest, straightforward, be  
13 cooperative, you know, just sort of a general sort  
14 of, you know, making staff aware and that you may  
15 be contacted. And if you are, you know, please  
16 follow through accordingly, you know, on a  
17 professional, honest, ethical way, you know, that  
18 type of thing.

19 Q Okay. And then lastly, Representative  
20 Mooney. Any -- any conversations with him about  
21 the review or -- or the response to the review?

22 A No. Nothing that I can recall of any



1 specific nature.

2 Q Okay. Okay. And then just kind of  
3 moving on down that laundry list. One of the  
4 things I want to talk about is the -- is the use  
5 of staff for what potentially could be personal  
6 errands. If you either ever -- ever seen that or  
7 had any concerns about that. We can start kind of  
8 generally and -- and then I'll -- I'll ask you  
9 some more specific questions, but I guess a direct  
10 question being -- have -- have you ever had any  
11 concerns about staff being used for personal  
12 errands?

13 A Yeah. I mean, there were some sort of  
14 times where people would be like, you know,  
15 running one of their kids to class. Heard  
16 rumblings that, you know, previous staff members  
17 had sort of babysit the younger child before that  
18 type of thing, you know, I've heard rumblings  
19 about Ranier doing things for the family, you  
20 know, car repairs, that type of thing. So -- and  
21 in all honesty, yeah, you know, I definitely had  
22 heard sort of, kind of I'm blurring other lines,

1 if you will.

2 Q Okay. We can run through some of those  
3 specifics. Let's -- let's take those couple of  
4 examples that you gave me just kind of one-by-one  
5 quickly. So first you said running -- running  
6 kids to class?

7 A Yeah. I know the oldest son took some  
8 classes at Blue Ridge here in Martinsburg, the  
9 -- the community college or the technical and  
10 community College here. And my understanding was  
11 is that there had been times where perhaps  
12 somebody gone to pick one of the kids, you know,  
13 pick him up that type of thing. I don't think it  
14 was a normal part of the -- of the schedule, but  
15 just on occasion when there was need, I think Mrs.  
16 Mooney probably did a lot of that. Again, I'm  
17 speculating on that -- that type of thing.

18 Q When you say Mrs. Mooney did -- did a  
19 lot of that, you mean made those requests?

20 A No. No. It was just -- would happen on  
21 a -- and I don't even know who would make the  
22 request quite frankly. I know one time I was with

1 the -- literally the -- the community college is  
2 like a half-mile off Interstate 81 and sign out  
3 one time I was driving somewhere. It's been a  
4 long time ago, probably back '18 and like, Oh, can  
5 we drop my son off at school?

6 You know, and like I said, it was a  
7 very, very minor blip off what the normal route  
8 would have been. Certainly seemed very reasonable  
9 thing to do at the time. Now, like I said for  
10 other things where, you know staff had babysat or  
11 picked up one of the kids somewhere, that type of  
12 thing.

13 Q I think maybe I misunderstood what you  
14 had said earlier. Did you mean if that normally  
15 was Mrs. Mooney that would pick up the --

16 A Yeah. That was my understanding that  
17 she would probably be the one who was doing that  
18 or even -- even (inaudible) Lala possibly. I --  
19 I'm not sure specifics like it probably varied  
20 from day to day and time to time.

21 Q Do you remember who told you that they  
22 had picked up the older son from Community

1 College? Do you know who might have done that.

2 A Maybe Rainer, you know, it's possible.

3 Q And then you mentioned babysitting  
4 sometimes. Do you recall any specific incidents  
5 or any -- any specifics staffers that might have  
6 done that?

7 A Yeah. This -- this goes back to when  
8 Hannah, I think, Mansell -- Hannah Mansell if  
9 you heard that name, that she was part staff, part  
10 campaign and I heard from others, you know, that  
11 sometimes she would take care of the kids, watch  
12 the kids on occasion while she was working in the  
13 house on the campaign staff. But, again, I --  
14 that was second, third-hand information. So  
15 wasn't anything I can specifically attest to. You  
16 know, actually. Did it occur when it occurred or  
17 anything like that?

18 Q Okay. And then quickly this on -- on  
19 those first two running kids to classes or baby  
20 sitting. Do you know -- did those happen sort of  
21 during traditional work hours like, you know, 9:00  
22 to 5:00 or 9:00 to 6:00?

1           A     I'm -- I'm sure they did. I'm sure they  
2 did. Yeah.

3           Q     You also mentioned Rainer doing car  
4 repairs. Can you go into a little more detail  
5 about that?

6           A     This is the idea that I know the -- the  
7 Mooney's had older vehicles typically, and Rainer  
8 would on occasion make sure they were operational,  
9 I guess if you trying to make because he's -- he's  
10 -- he's very skilled in that regard. And so he  
11 was -- I think he was pretty helpful to the  
12 Mooney's as far as the maintenance of their  
13 vehicles, helping them was in that regard. Not --  
14 not -- not solely him, of course, but -- but just  
15 would -- would take care of some things when they  
16 needed to be done if they were minor nature, that  
17 type of thing.

18          Q     Okay. And -- and just to make sure I  
19 understand, you don't mean that he would take the  
20 car into like a car repair shop. You mean he  
21 would -- he would actually do the repairs on the  
22 car?

1           A     Probably both, I'm guessing.

2           Q     Okay.

3           A     Sometimes it would be to a repair shop,  
4 sometimes he would do work himself. That's my  
5 understanding.

6           Q     Okay. I have some kind of examples we  
7 could go through or -- or not actual examples,  
8 just kind of hypothetical situations. But is  
9 there anything before we go through that kind of  
10 list? Anything else off the top of your head that  
11 -- that you can think of that falls into that  
12 category of things that seemed like they might  
13 have been personal errands?

14          A     You know, I -- I -- I can't -- I can't  
15 really think of anything. At one time I did a  
16 little work for the daughter. She was doing a  
17 saying what the daughter was calling a read  
18 program for -- for -- for children and it was a  
19 nice school project. And I got a couple of  
20 contexts for her, you know, but it wasn't anything  
21 very time-consuming or anything else, but, no.  
22 Other than that, not really, you know.

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

61

1 Q Just taking that maybe that example of a  
2 -- that situation. Just having an example. Do  
3 you recall who -- who originally asked you to help  
4 her with that project?

5 A I think they communicated through [Former Staffer 1]  
6 to me and then I exchanged a couple of e-mails  
7 with the daughter.

8 Q Okay.

9 A Yeah.

10 Q And then like I said, we can go through  
11 a couple sort of hypothetical or sort of typical  
12 instances and -- and you can tell me if they ring  
13 a bell, or if you think of any new --

14 A Okay.

15 Q So maybe we can talk about the tasks for  
16 particular family members. Do you remember  
17 anything that you did for -- let's take Grace  
18 Mooney first?

19 A No. No. I've never done anything for  
20 Grace.

21 Q No? Okay. Or how about I think you've  
22 mentioned represented Mooney's mother, Lala?

1           A     Yeah.  No.

2           Q     Any recall --

3           A     No.  I mean, you know, I consider Lala a  
4 friend and we communicate on personal e-mails and  
5 stuff, but have not really done anything on office  
6 time that would sort of go beyond, you know, what  
7 would normally take place.  You know, like I said,  
8 I consider her a friend and somebody that  
9 obviously cares a lot of about her son.  She's  
10 probably -- she's -- she's probably his most  
11 ardent supporter and she gets out and about and  
12 visits a lot of folks and everything.  As -- as,  
13 you know, for an 80-year-old woman, she's the  
14 sweetest lady.  So, yeah.

15          Q     Okay.  Any more sort of driving related  
16 tasks that you can think of or specific incidents  
17 where -- where you think the -- the trip was for a  
18 personal purpose as opposed to official or  
19 campaign?

20          A     Nothing that involved me.  The -- the  
21 only time, quite frankly I can recall that I did  
22 anything on a personal basis that Jane road trip



1 earlier this year where it was a Saturday and  
2 congressman, after that trip, instead of going  
3 home, went to her home in Virginia, sort of, I  
4 guess it'd be east of the Winchester area to visit  
5 a friend that they were having a little get  
6 together with folks for UFC or one of them, I  
7 don't know.

8           Probably UFC type fight thing and you  
9 know, I claim mileage. I forget whether it was to  
10 the district office to my house, but I didn't  
11 claim anything beyond that. Just sort of aid  
12 those costs because I knew they were legitimate  
13 cost to make beyond what I should claim. So --

14           Q     Okay. Right.

15           A     Yeah.

16           Q     Do -- do you recall about how long that  
17 -- that detour to that friend's house was?

18           A     For me, is probably a round trip of 60  
19 maybe 70 miles from, you know --

20           Q     In addition -- in addition --

21           A     -- in addition to what I would have  
22 claimed. I -- I don't know the exact figure --

1 the exact number, but it was probably something  
2 close to that. And that -- and that would be the  
3 -- the grand total. So 30, 35 miles each  
4 direction.

5 Q Great. And then just thinking about  
6 that as an example. How -- how was that request  
7 made to you or -- or described to you?

8 A Yeah. I mean, we were -- we were -- we  
9 were driving headed back. He said, Oh, by the  
10 way, could you run me over to this friend's house?  
11 We're going over there and then my understanding  
12 was the son was already there and they were going  
13 to drive back in their personal vehicle, you know,  
14 that type of thing. So --

15 Q Did -- was there any recognition from  
16 Representative Mooney that this was a personal  
17 favor or a personal trip as opposed to work or did  
18 it come as kind of just a standard type of work  
19 request that he would make? Can you drive me --

20 A It was Saturday and it was Saturday  
21 evening and it was getting late and they -- they  
22 -- they, I guess had that planned and so because

1 we were getting probably back later than  
2 anticipated perhaps, I'm not even sure about that.  
3 Can I run them over there? Would that be okay?  
4 And I said sure.

5 Q Okay.

6 A You know, and it was not asked that I  
7 not report it or anything. I just took it upon  
8 myself to say look, that's not something I can  
9 claim officially. So I didn't.

10 Q Great. For -- in any discussion that  
11 you -- that you have with anybody else, either  
12 Rainer or discussions about like Hannah looking  
13 after the kids. Did you get an impression from  
14 those individuals about -- about how they received  
15 those requests? Did they understand them as  
16 personal errands that they could turn down or did  
17 -- or was this just seen as sort of, you know,  
18 understood that this was part of your -- your job  
19 as far as -- yeah. Was it -- was it understood  
20 that that was, you know, standard or -- or a  
21 normal part of their job?

22 A I -- I know that such requests probably

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

1 -- well, not on a regular basis, were not  
2 infrequent either. I never had a conversation  
3 with Hannah about those things like I said.  
4 Rainer I would talk to on occasion and, you know,  
5 just I think he, [Former Staffer 1], [Former Staffer 2], others kind of  
6 would express concern that, you know, some of  
7 these things were certainly not appropriate, if  
8 you will, and sort of go beyond what should be  
9 asked of a staff person. I can say I don't --

10 Q Did --

11 A -- regular, but I -- but on the other  
12 hand, I -- they -- they did occur on -- on number  
13 of occasions.

14 Q Okay. Did -- did you ever get an  
15 impression from them or have a conversation about  
16 whether or not they felt comfortable saying no to  
17 the congressman?

18 A No. I -- I mean, I -- [Former Staffer 2] probably  
19 would be uncomfortable saying no, I would think.  
20 That was my impression. I don't think [Former Staffer 1] would  
21 be uncomfortable saying no, you know, Rainer,  
22 because you'd have to understand who Rainer is and

1 -- and he's really kind of a very strong supporter  
2 of the congressman, felt like it was -- you know,  
3 I mean, he -- he would sometimes express concern.

4 But the other hand, he would also  
5 willingly do it. It wasn't like -- so I don't  
6 know whether he felt uncomfortable saying no or  
7 not, but it seemed like he was willingly wanting  
8 to do things, just be helpful and supportive over  
9 the time that he was with the congressman.

10 Q Okay. Understood. Did you ever hear  
11 about any tasks related to dry cleaning or -- or  
12 laundry -- the personal attire?

13 A I mean, vaguely I may recall like  
14 fearing like maybe Hannah pickup the laundry or  
15 something like that. I -- I have no direct  
16 knowledge of that occurring. Just sort of  
17 indirect conversations that, you know, hadn't  
18 occurred and that would have been a very -- I may  
19 have heard that once or twice, you know, during my  
20 tenure here. Nothing recently in that regard,  
21 but, yeah, I -- I can't say that I've never heard  
22 it.

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

68

1 Q Okay. And then, just generally, you  
2 know, you know, I know Rainer retired, and I -- I  
3 don't think Hannah spoke to the congressman  
4 anymore --

5 A No. She had been throw --

6 Q -- so there is -- you know. Okay. In  
7 hearing about turnover in the office or -- or  
8 people leaving, did you ever get the impression  
9 that anybody left or that part of the reason for  
10 their departure was because they wouldn't do these  
11 sorts of tasks for the congressman?

12 A The only person that I -- that I got the  
13 impression left that was encouraged to leave, let  
14 me put it that way, maybe would be [Former Staffer 3], just  
15 because she was not doing the best of work on  
16 tracking the finances and -- and -- and so forth.  
17 Then off course recently there was [Former Staffer 6] who was  
18 dismissed for -- I would kind of call it  
19 insubordination.

20 Q Okay. Yeah, we can come -- one of the  
21 laundry list items is -- is [Former Staffer 6] so we can -- we  
22 can come back to that in a second. So you said

1 you -- your impression about [Former Staffer 3] departure  
2 was -- was more related to the quality of her work  
3 and less to do with --

4 A Well, I mean --

5 Q -- agreeing to or not agreeing --

6 A -- she left to get another job. I'm  
7 sorry. I'm -- I'm talking over you. I apologize.

8 Q No.

9 A She left to --

10 Q Go ahead.

11 A -- get another job on the Hill. I  
12 believe it was Congressman Livingston's office in  
13 Louisiana is my recollection. It's like I said, I  
14 don't think she was fired. I do know there was  
15 displeasure with some of her work performance.

16 Q Okay.

17 A So it -- it may have been sort of a  
18 mutually -- a mutual thing, if you will.

19 Q Okay. But did -- did you -- I had  
20 originally asked the question, you know, did  
21 anybody depart basically because they wouldn't do  
22 those sorts of personal errands. And -- and you

1 mentioned [Former Staffer 3] but it sounds like maybe her  
2 departure had more to do with the quality of her  
3 work --

4 A Yeah -- yeah --

5 Q -- or was it also --

6 A -- that -- that --

7 Q -- or what -- okay.

8 A No. I -- I don't know of anything  
9 specific in that regard for anybody that they were  
10 asked to do something and they didn't do it, and  
11 therefore were -- were kind of forced out. I  
12 don't have any recollection of anything like that.  
13 The only --

14 Q Okay.

15 A -- staff turnover evident, you know,  
16 within the last three to six months, you know,  
17 there's been a -- a -- a number of folks leaving.  
18 Anything I would say about their departures would  
19 be speculative. I know [Former Staffer 1] situation and he's  
20 got a -- he got a great job at [REDACTED] and I  
21 told him, I -- I thought it was, like, his perfect  
22 job. So I -- I think that was a natural thing for



Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

71

1 him. I know he had been kind of looking to leave  
2 at some point and COVID kind of reduced those  
3 opportunities, if you will.

4 But this seemed like a natural move for  
5 him to make. You know, [Former Staffer 2] departure,  
6 Lynn's departure, Garrett's departure, I mean,  
7 again, they were all going to other folks. So I  
8 think there was probably, even in [Former Staffer 1] case,  
9 concern about sort of the investigations, and  
10 where that was leading, and everything, and that  
11 -- that may have played a role in their decisions.  
12 I -- I can't speak to what their actual rationale  
13 was or not in regard to the ethics issues with the  
14 congressman.

15 Q Okay. Understood. Let's -- and then  
16 just quickly just to make sure I understood the  
17 full story on [Former Staffer 1]. Other than -- than the [REDACTED]  
18 [REDACTED], was there -- was there anything else  
19 kind of leading to his departure, any -- any  
20 concerns of either his work or -- or his  
21 willingness to do sorts of -- the sort of personal  
22 errands that we talked about?

Transcript of Interview of Current Staffer 2

Conducted on October 1, 2021

72

1           A     Yeah. I'll tell you [Former Staffer 1] was held in  
2     very high regard by, I think, both Michael and the  
3     congressman for the -- the thoroughness and  
4     professionalism of his work. And I can attest to  
5     that myself that -- that [Former Staffer 1] was a -- was a great  
6     district director. And the -- the only thing I  
7     can say to -- to -- to [Former Staffer 1] and the -- and the  
8     congressman was that there would -- there would be  
9     some frustration, you know, primarily him not  
10    getting out and -- and being out and about as much  
11    as, you know, he would like.

12                 I think there was -- I think probably  
13    there was a general consensus amongst most staff  
14    that they wish he was out in the field more,  
15    meeting with constituents, talking to folks,  
16    having events, you know. I know in my life I've  
17    been around number of political folks,  
18    congressman, even senators, and it feels like  
19    they're a little more active than Congressman  
20    Mooney.

21           Q     Okay. All right. So then -- then,  
22    generally, he departed on pretty -- on good terms,

1 I guess?

2 A Oh, yeah. Yeah. Without a doubt. I  
3 mean, I think they -- both the congressman and  
4 Michael would -- would say they really hated to  
5 see him go just because he was so professional and  
6 so dependable.

7 MR. QUINN: Okay. Great. We've been  
8 going for about an hour and 20 minutes. I hope  
9 we'll wrap-up relatively soon, probably in the  
10 next 20 minutes or so. But do you need to take a  
11 break either for water, or bathroom, or anything?

12 THE WITNESS: I got a couple of water  
13 here. I'm great. I'm fine. If you need to do  
14 so, I'm good, too. So whatever you need to do,  
15 Sean.

16 MR. QUINN: Why don't -- why don't we  
17 take a quick five-minute break off --

18 THE WITNESS: Okay.

19 MR. QUINN: -- the record. I'm just  
20 going to look back at my notes and make sure we've  
21 covered most things and then I'll try to tighten  
22 everything up so that we can get out of here --

1 THE WITNESS: Sounds good.

2 MR. QUINN: -- quickly.

3 THE WITNESS: All right.

4 MR. QUINN: Okay. So -- so then Kevin,  
5 we can go off the record and then I'm just going  
6 to mute my video and audio for a few minutes and  
7 why don't we -- I'll turn everything back on in  
8 about five minutes.

9 THE WITNESS: Sounds good.

10 MR. QUINN: Okay. Okay. Great.

11 THE REPORTER: Off record --

12 MR. QUINN: Thanks, Current Staffer 2.

13 THE REPORTER: -- 11:19 a.m.

14 (Whereupon, a recess was taken.)

15 THE REPORTER: Back on the record.

16 11:24 a.m.

17 BY MR. QUINN:

18 Q Okay. The only thing -- I just reviewed  
19 my notes almost making sure I'd covered  
20 everything. The -- the one thing I did want to  
21 ask you about a little more quickly, the issue of  
22 the gift card being used as a reimbursement

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

75

1 method. I know you said that policy sort of  
2 changed -- changed at one point. Can you remind  
3 me when you think that -- that happened?

4 A Yeah. Again, it -- it was at July or  
5 August of 2020.

6 Q Okay. Go.

7 A So that -- remember that visit was to  
8 Nemacolin. The original conversation primarily  
9 with [Former Staffer 3] was that I'd be reimbursed with a gift  
10 card. And then --

11 Q Right.

12 A -- that later -- and it sort of in  
13 process of getting that turned around. Said, Oh,  
14 we -- we shouldn't do that. So we're going to  
15 just -- he ended up giving me a personal check for  
16 it.

17 Q Okay. And then do you recall -- do you  
18 know how that -- how that policy change happened,  
19 or who recommended it, or who identified it as an  
20 issue?

21 A No. [Former Staffer 3] didn't really go into much  
22 detail about it. So I don't recall much of the --

1 the logic. I -- I -- Mike -- Michael may have  
2 said something in passing about the -- the -- the  
3 reasons why, but I don't even recall what those  
4 were to be honest. It was kind of confusing to me  
5 anyway as to why they originally thought it was,  
6 you know, sort of a proper reimbursement tool and  
7 -- and then what it's not.

8 Q And then do you recall any other uses  
9 for those gift cards or -- or did you see any  
10 other use for those gift cards?

11 A No. Aside from what I saw in the -- in  
12 the report that came out, you know, that they were  
13 used on a -- I guess, on a variety of ways and I'm  
14 -- I'm not even sure specifically how they were  
15 used beyond, you know, like for campaign related  
16 expenses and that type of thing. But yeah.

17 Q Okay. Okay. Great. Then let's move on  
18 to talking quickly about [Former Staffer 6]. I know you  
19 mentioned you were aware some of the circumstances  
20 of his departure.

21 A Right.

22 Q And can you just -- can you just tell me

1 about that generally?

2 A My impression about what happened there  
3 was that he was in a conversation with a gentleman  
4 who I had also talked to before too and actually  
5 had meetings with Chuck de Caro. And original  
6 meetings were to you'd like to meet with a  
7 congressman and he had some concerns about  
8 international relations affairs. He had a  
9 background that, you know, he was a CNN reporter a  
10 while back. He had done instruction at military  
11 for military officers in the past. He had been a  
12 special ops guy himself back when he was much  
13 younger.

14 So, you know, certainly I took a meeting  
15 with the guy and I recommended actually that the  
16 -- the congressman meet with him. They didn't  
17 want to. I guess that was an irritant to Chuck.  
18 And he told me as much and began writing some  
19 series of articles in the American Greatness, I  
20 guess it's a podcast or something or it's actually  
21 on the web, too, written articles that were pretty  
22 scathing of the congressman and Michael in

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

78

1 particular. Congressman (inaudible) with him as  
2 well. And you know, they -- his wife is the  
3 former Headline News anchor for CNN.

4 And so they live in Harpers Ferry, so  
5 they're constituents as well. And I told folks,  
6 you know, I don't agree with -- I don't think I  
7 told this to Michael or the congressman, but I  
8 think I basically felt like, you know, Chuck was  
9 kind by of an East Coast kind of guy and kind of  
10 had the same mentality that, like, a President  
11 Trump would have, that if -- if he wouldn't, you  
12 know, if -- if you diss me, I was going to diss  
13 you harder kind of thing. And so I think that was  
14 kind of the -- the logic of Chuck's motivation in  
15 doing some of those articles.

16 I think from what I understand, [Former Staffer 6]  
17 was sort of a mole for him in the office. Chuck  
18 never told me that. He never gave me a name. But  
19 as putting -- connecting the dots, it appears to  
20 [Former Staffer 6] was that individual. And from what my  
21 understanding with the investigation they did,  
22 they found out that he had had correspondence with



1 and conversations with Chuck and was divulging  
2 internal matters that were -- were very  
3 unprofessional in nature and led to his dismissal.

4 Q Okay. And so you said -- you said that  
5 you had had some initial meetings with Mr. de Caro  
6 --

7 A And even conversations --

8 Q -- when --

9 A -- after the fact, too. Even after some  
10 of the articles had been written he had called me  
11 a couple of times, and I'd even met with him a  
12 couple of times because I was still trying to  
13 encourage them to meet with him. And again, that  
14 was, yeah. They just thought he was this crazy  
15 guy, and a mean guy, and they didn't want anything  
16 to do with him. Everything. And my final  
17 conversation with him was probably maybe two  
18 months ago.

19 And I said, pretty much, Chuck, you  
20 know, I understand your frustration. I wish  
21 they'd meet with you, too, but they're not. And,  
22 you know, you know, you're doing a lot of harm to

1 the -- the most conservative guy in the state as  
2 far as members of Congress, and is that what you  
3 really want? Because Chuck always portrayed  
4 himself as very a conservative guy. And so --  
5 excuse me, I got a --

6 MR. QUINN: Hope no complaints if you  
7 need to take a break.

8 A You know -- you know, look at where  
9 you're headed with this and is this what you're  
10 really want to do just because he won't meet with  
11 you? And so I don't know how much influence, if  
12 any, that had with Chuck, but I've -- there have  
13 not been any articles since then.

14 So like I say, I was trying to kind of  
15 look out for the congressman's mom in the process  
16 and just kind of have conversations with her about  
17 her meetings with Chuck. And, again, those were  
18 all sort of not -- not on any official capacity,  
19 but just sort of off the record stuff that I and  
20 her and I had private conversations about with  
21 Chuck -- about Chuck, if you will, and I was just  
22 kind of looking out for her, too, but -- and that

1 was the nature of things.

2 Q So was -- was Chuck in conversation with  
3 Lala also?

4 A They actually he met with -- Lola met  
5 with Chuck and his wife for a lunch one Saturday,  
6 awhile back, I would say probably April, maybe.  
7 Something like that.

8 Q April of 2021?

9 A Yeah -- yeah. It was this year. It was  
10 April or May, something like that.

11 Q I think we'll return to the kind of  
12 specific interactions with -- with Chuck. But I  
13 wanted to ask more generally about policies around  
14 interacting with the press or how staff interact  
15 with the press. Is -- is that part of -- do you  
16 consider that part of your duties --

17 A No. As a matter of fact --

18 Q -- one of them is to interface with the  
19 press?

20 No. No. It's not an policies during  
21 clearing the office about that, you know, really  
22 -- the communications director, Chief of Staff,

1 the congressman, are the only people that should  
2 be talking to the press. And then the Chuck  
3 situation, his original representation was not as  
4 a member of press. It was as a like constituent  
5 -- it's kind of morphed into him writing articles  
6 and becoming a member of the press at that point.

7 And -- so, yeah, the original thing was  
8 just same as a constituent, and, quite frankly,  
9 you know, his motivation, again, he had some  
10 concerns, he wanted to, you know, be the  
11 congressman about international concerns, China,  
12 you know, Russia, had a really good background and  
13 those types of issues. But then, that also  
14 morphed into more his idea that I really liked to  
15 sit down and helped the congressman do a better  
16 job of -- of standing up for conservative values.

17 And he's on the same committee as AOC  
18 and Maxine Waters, the Financial Services  
19 Committee and Chuck's idea was he should be going  
20 after those folks all the time and given his  
21 background, you know, as a -- as a Hispanic  
22 himself, you know, he couldn't be -- he could

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

83

1 consider himself a minority, if you will. And so  
2 nobody could say he was this white guy going after  
3 women of color or other ethnic origin, that type  
4 of thing. And his idea was, you know, you got  
5 this bully pulpit, you should use it and you  
6 should, you know, dress better.

7 His background in TV, you should make  
8 your appearances, you know, he was saying, I went  
9 to help him do a better job of doing his job. And  
10 they just, you know, turned the deaf ear to all of  
11 that stuff. My -- my words to, like, Lynn Hatcher  
12 and others, [Former Staffer 1], was, you know, if he would just  
13 meet with this guy, I don't think he's a type of  
14 guy that would, you know, after you met with him  
15 and maybe you might like, you know, I mean, they  
16 -- he brings a lot of things to the table that --  
17 some expertise that maybe helpful. He's not  
18 wanted to get paid for anything.

19 I don't want to be paid for anything. I  
20 just want be, you know, help this guy do his job,  
21 you know. That was his kind of mindset. So  
22 whatever reason that never came to fruition and I

1 could say, my last contact with Chuck was just try  
2 to encourage him to cease and desist, if you will.

3 Q Okay. So you said last contact was  
4 about two months ago. Can --

5 A Yeah, give or take. Yeah.

6 Q Do you recall the -- the first time you  
7 spoke to him?

8 A I think our first meeting --

9 Q Like when that was.

10 A It was like a meeting request and I  
11 think it was March of this year. And I did set  
12 something up for -- for him to also meet with  
13 senator Capito's office as well. So we had a  
14 joint meeting in our offices here in Martinsburg  
15 to have, you know, that again, was more on the  
16 international side of things and that was kind of  
17 the initial point of a conversation, like I say,  
18 then they kind of morphed into this more, I can be  
19 a help to the congressman, help him do a better  
20 job. That's appearance and sort of rhetoric and  
21 everything.

22 Q And then I think at some point,

1 obviously Mr. Hough and Representative Mooney  
2 became aware of Chuck -- or Mr. de Caro, weren't  
3 happy with those interactions and -- and they  
4 warned staff off of speaking to Mr. de Caro; is  
5 that right?

6 A Right -- right.

7 Q Okay. And when do you -- do you recall  
8 when that happened?

9 A That would probably be June of this  
10 year. And I did have conversations with Mr. de  
11 Caro after that. Quite frankly, I did not contact  
12 him. He contacted me on my personal cell phone.  
13 And so those conversations were response to him  
14 calling me.

15 Q Okay. And do -- were Mike -- Mike Hough  
16 and Representative Mooney were in those  
17 conversations?

18 A I don't know about specific -- the  
19 specific conversations, but I think in general  
20 they were aware that I had talked with him and at  
21 some point they -- they came back to me and said,  
22 look, like you really just need to quit talking to

1 this guy. And so I did. You know, and he I  
2 again, like I said my last conversation was more  
3 of Chuck you just need to cease and desist.  
4 You're not -- this is not going to go anywhere.

5 And, you know, let's -- let's, you know,  
6 hopefully damage has already been done -- done and  
7 -- and anymore damage would not be helpful to the  
8 cause, so to speak. If you're really a  
9 conservative guy and want to see conservative  
10 things happen, you're going after the one true  
11 conservative in the West Virginia delegation that  
12 really sort of stands for conservative values and  
13 so forth. So that was my -- that was my message  
14 to Chuck, in the last time I talked to him.

15 MR. QUINN: Okay. I want to understand  
16 a little bit. I'll -- I'll preface some of these  
17 questions with saying I understand this can be  
18 sensitive issues, particularly for you since  
19 you're still on Representative Mooney's office.  
20 So if -- if anything we've talked about today --  
21 so I'll preface that with, if anything, we talked  
22 about today is particularly sensitive for you, I



1 hadn't explained before, but when witnesses  
2 cooperate we itemize their names and reports --  
3 actually can -- can we go off the record for one  
4 second while I just explained that?

5 THE REPORTER: Off the record about  
6 11:38 a.m.

7 (Whereupon, a discussion was held off  
8 the record.)

9 THE REPORTER: Back on the record, 11:40  
10 a.m.

11 BY MR. QUINN:

12 Q So I wanted to ask, you know, I know you  
13 said that there at some point, was a warning to  
14 stop not to talk to Chuck. And that's all of your  
15 conversations with Chuck continued after that? It  
16 sounds like maybe Mike and Representative Mooney  
17 were generally aware that you were in contact with  
18 him, but maybe not, you know, appraised of the  
19 specifics of your conversation?

20 A Right.

21 Q Does that sound about accurate?

22 A Yeah. I don't know after how much

1 awareness they had or didn't have, but, you know  
2 my motivation was again, kind of twofold, well,  
3 threefold. I was trying to look out after his  
4 mother a little bit because I knew she was still  
5 in contact with him to some level, or was planning  
6 to be. And so I was trying to be sort of a  
7 guardian of her, if you will, on case she needed  
8 any help, guidance, that type of thing. And then,  
9 again, I was also concerned about the nature of  
10 the articles, that they were hostile in nature and  
11 that they were doing damage.

12 I was trying to, at the end, like I say,  
13 especially trying to encourage him to kind of just  
14 turn off the spigot it so to speak, You know,  
15 basically asking where it's just going to go. You  
16 know, you -- you had your fun and you -- you kind  
17 of, you know, made light at some things and saying  
18 but at the end of the day, where is this going to  
19 go? What's -- what's your goal here and you  
20 really want to maintain sort of having somebody  
21 with some real solid conservative values, then  
22 you're really kind of going after the wrong guy,

1 you know, that type of things.

2 So again, I don't know what really  
3 happened to her or what his motivation was to stop  
4 and whether he will continue at some point in the  
5 future. I don't know. I have no idea. But that  
6 was the extent of it.

7 And I guess, and the third thing, quite  
8 frankly, and I was at the August 2nd lunch and we  
9 talked about Chuck in Moorfield, and, you know,  
10 both the congressman and his wife were both like,  
11 Oh, we've seen people like this before, and we  
12 just did not even talk with them. And I'd hoped  
13 that they would actually -- I thought there was  
14 somebody to talk about, except both, just from  
15 getting him to be more cooperative, but also there  
16 could be some things they could learn from him  
17 given his past background and TV and -- and he was  
18 a Screen Actors Guild member.

19 He was a consultant to JAG and NCIS  
20 television shows and had some expertise that they  
21 kind of overlooked, I think, or didn't want to  
22 factor into the equation. I was just trying to be

1 helpful to the member and -- and I really thought  
2 that the end of the day there -- there could be  
3 some things that might be some benefits that he  
4 could offer, but I cannot -- that was not  
5 something they thought and so ultimately that's  
6 their call to make.

7 Q Okay. Do you know was the congressman  
8 aware that his mother and Chuck --

9 A Yeah.

10 Q -- were having conversations?

11 A Yeah. And they were both -- him  
12 especially, he was very direct to his mother  
13 about, you know, not talking to him.

14 Q Okay. And then we've talked about how  
15 you piece together or it's your opinion that Chuck  
16 was also talking to [Former Staffer 6] --

17 A Yeah.

18 Q And -- and -- and you talked about  
19 basically sort of an investigation or an internal  
20 investigation that maybe like and the congressman  
21 did to figure out who was talking to Chuck. Can  
22 you -- can you tell me what you know about that --

1 that process or that situation?

2 A You know, I don't know much about it  
3 except that they were -- they were basically going  
4 through, you know, staff, official e-mails and --  
5 and -- and sort of correspondence things.

6 Their original assumption was that they  
7 had been hacked, you know, and I -- I doubted that  
8 was very much the case because, and I don't know  
9 Chuck super well, but I know him well enough to --  
10 to relay thing that -- that was not something in  
11 his own way, he's a man of integrity, too, and I  
12 would never think he would stoop to that level of  
13 -- of -- and I don't know that he had the  
14 expertise to do it quite frankly, but, again, I  
15 think that was their original assumption.

16 And then once they started going through  
17 and kind of did the internal investigation and  
18 found out what [Former Staffer 6] was doing, they realized  
19 that, you know, he was the leak, so to speak.

20 Q Okay. So I wanted to ask since -- since  
21 you were in conversation with Mr. de Caro and some  
22 of those conversations were after staff had been

1 warned not to talk to him. And I guess you  
2 understood that they were sort of doing an  
3 investigation to under -- to figure out where the  
4 leaks were coming from. Did you have any concern  
5 that you were going to be, you know, kind of swept  
6 up in that or -- or that they might say that you  
7 were the source of those leaks.

8 A I mean, you know, that crosses your  
9 mind. I mean, I know I had nothing -- I didn't  
10 feel like I had anything to hide that's why I  
11 think I'm with you today, too, quite frankly, I --  
12 I don't -- my motives in this whole process to try  
13 and be of help to the congressman, not to harm  
14 him. And so -- and -- and to help his mother as  
15 well as who I genuinely like and who, I think an  
16 awful a lot of, you know, so like I say my -- my  
17 motivations I -- I guess they were multiple  
18 motivations, if you will, in the whole process.

19 In that dialogue. I don't -- I don't  
20 know that I talked to Chuck Mr. de Caro after I  
21 knew there was an internal investigation going on,  
22 I just -- those time frames were very close

1 together. That internal investigation didn't  
2 start until in the late July, the earliest would  
3 be my guess. I'd have to look back and see  
4 precisely, but that sounds about right.

5 Q Okay. And I don't want you to speculate  
6 too much, so just let me know if you don't have an  
7 answer to this, but you -- you described that you  
8 weren't too concerned about the investigation  
9 because you knew your motivations and -- and felt  
10 like your conversations with Mr. de Caro were kind  
11 of in Representative Mooney's interest  
12 understanding that it appears [Former Staffer 6] was let go  
13 because of his communications with Chuck, how do  
14 you think they were different? Do you think his  
15 -- his motivation was different or --

16 A Oh, yeah. No -- no. I think there was a  
17 purposeful intent on his part to -- to feed  
18 information to Mr. de Caro that was used in those  
19 articles to, I guess, inflict pain/damage on the  
20 congressman and Mike and everybody else, you know,  
21 so in that, his motivation I would think is -- is  
22 almost a 180 from mine as to -- and why he

1 wanted to -- why he did that, I -- I have no clue.

2 [Former Staffer 6] was -- is a bright young man. I think the  
3 congressman genuinely liked him. I think Michael  
4 genuinely liked him.

5 And why he saw fit to kind of, sort of  
6 feed that process is beyond my ability to  
7 comprehend that, if you will. You know, And I  
8 would -- I would offer that there's two shots. I  
9 -- there was -- I had a legitimate concern, you  
10 know, I mean, I -- I -- I know my -- in my own  
11 heart what it was, but their interpretation of  
12 what I was doing at some point I, you know, I  
13 said, you know, who knows, you know, at the end of  
14 the day I can, you know, if it came -- came to,  
15 like, was my head held -- help -- head-held high,  
16 so to speak.

17 But I certainly didn't know the  
18 interpretation Michael or the congressman might  
19 make in that regard as well so --

20 Q Okay. Did -- did you end up ever  
21 having, as a result of that investigation, did you  
22 ever end up having a conversation with Mike or the



1 representative that was sort of, you know, like  
2 Come to Jesus moment about communications with  
3 Chuck, did they say like, Hey, you need a cut --  
4 you need to cut communication --

5 A Yeah. No. Yeah, I mean, I tried to be  
6 upfront with them. I'm sorry. I talk over you  
7 again, I apologize. I -- I tried to be upfront  
8 with them as much as I could. Like I say, at that  
9 -- at that August 2nd lunch, you know, we did talk  
10 about some -- to some degree, and I -- I -- I'm  
11 almost a hundred percent sure I have not talk with  
12 Chuck after that lunch. And so, yeah, I mean, no,  
13 they -- they just had a different interpretation  
14 of him and who he was and, you know, at -- at the  
15 end of day it was all who made their call as to  
16 whether or not to -- to use him.

17 Like I said, my attitude was you could  
18 have avoided all of these issues and problems with  
19 him had you just taken the time to -- to meet with  
20 him and -- and perhaps and -- and again, whether  
21 or not they would have ever taken him up on his  
22 offer to help I'd have no idea, probably not. But

1 at least meeting with the guy and giving him a  
2 sort of chance to offer some guidance and  
3 direction I think whether, you know, spend a half  
4 hour, go have coffee with him in Harpers Ferry or  
5 something, you know, but --

6 Q Right.

7 A -- they didn't see fit to do that.

8 Q Okay. And -- and then focusing again a  
9 little bit on -- on [Former Staffer 6], we, as I sort of just  
10 explained to you, keep witnesses anonymous and --  
11 and don't disclose who we talk to and -- and don't  
12 talk to.

13 So I'm not making any representations  
14 about whether or not we have talked to [Former Staffer 6] but  
15 of our understanding from Representative Mooney  
16 and his counsel is that they are concerned about  
17 our perception of -- of [Former Staffer 6] firing and have  
18 explained to us why -- why [Former Staffer 6] was let go and  
19 -- and in that process, have -- have essentially  
20 made the argument to the -- the OCE that they  
21 believed [Former Staffer 6] spoke to the OCE and that that is  
22 not the reason that they -- that they let him go.

1                   Have you heard anything about those  
2 sorts of concerns that part of the [Former Staffer 6]  
3 departure had to do --

4           Q     No.

5           A     -- with his involvement with OCE?

6           A     No. I -- they -- really until your  
7 request to interview me, I never even made the  
8 connection that [Former Staffer 6] and you already had talked  
9 or may have talked and that I certainly had no  
10 inclination or -- or that even the slightest  
11 motivation in his dismissal had to do with any  
12 conversations he had with your all's office. No.

13          Q     Okay. Are there -- are there any other  
14 members of the press that -- that you've had  
15 communications with other than to Chuck de Caro to  
16 the extent that we're going to call -- try to call  
17 a member of the press?

18          A     Right. Exactly, I know. It's kind of a  
19 --

20          Q     Any -- any --

21          A     -- I have not that I can -- that I can  
22 recall. I mean, I've been to a few events where

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

98

1 I've had a photograph taken and, you know, or had  
2 some remarks said at an event where maybe some  
3 things talked about that I said like in a letter  
4 or something from the congressman but had as to  
5 being interviewed or having conversations with or  
6 anything like that, no.

7 Q Okay. And then how about in the process  
8 of that internal investigation, did you hear about  
9 either [Former Staffer 6] or any other staffers speaking to  
10 any other members of the press?

11 A No. No.

12 Q And then how about anybody else talking  
13 to Mr. de Caro? Any other staff members other  
14 than you and [Former Staffer 6]?

15 A Not -- let me think. I did not -- I  
16 mean, [Former Staffer 2] talked to him initially, I believe as  
17 far as the scheduling requests and I don't even  
18 know if that's accurate or not, but I think that's  
19 true. But aside from that, I -- I don't know of  
20 anybody else on-staff that aside from answering a  
21 phone call or something like that would have --  
22 [Current Staffer 1] may have. No, but I think [Current Staffer 1] may have

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

99

1 -- he may have contacted [Current Staffer 1] or something, but  
2 I think that was very minimal --

3 Q Yes.

4 A -- but going to say other than that, I  
5 don't know of anybody.

6 Q Okay. I think we're almost done, just  
7 looking through some of my notes. I'm making sure  
8 I didn't miss anything.

9 One thing I'll ask you, going back to  
10 talking about the first review and collecting  
11 documents and information, I -- I know we talked  
12 about [Former Staffer 1] involvement in that process and  
13 [Former Staffer 2] and I think [Former Staffer 3] to some extent, and did  
14 -- did you ever have any conversations with them  
15 or concerns on your own about whether documents  
16 were being collected thoroughly or whether  
17 documents were being deleted or withheld from the  
18 OCE or tampered with in any way?

19 A Not whatsoever. No.

20 Q Okay. Then last couple of questions for  
21 you are just kind of more general questions. Is  
22 -- is there anything that we haven't talked about

1 today that you see as a concern that you would  
2 want us to be aware of? You know, we've talked  
3 about some various trips and using staff for  
4 personal errands. Any other issues that -- that  
5 you've noticed in your time at Representative  
6 Mooney's office that -- that you think we should  
7 be aware of?

8 A You know, I -- I think some of those  
9 things you're -- you're already aware of, you  
10 know. I think staff has always, you know, that  
11 I've been around, you know, this place express a  
12 little bit of concern of, you know, him just being  
13 a little -- I'm trying to think of the right  
14 words. I don't -- I don't think it's intentional  
15 sort of thing. Just not being thorough and  
16 thinking it through how what should be considered  
17 an expenditure.

18 I know a couple of times I've ended up  
19 eating costs just because he bought some things  
20 and I put on -- on my card and he said, Well, just  
21 write those off, and I never felt comfortable  
22 writing them off, because they seemed more

1 personal in nature than they were sort of  
2 legitimate. Like, it was beyond just, you know,  
3 buying a loaf of bread at a -- at the -- at the  
4 garden market or something that wasn't just for  
5 lunch right then that was going to be taken home,  
6 you know, that type of thing.

7           You know, it's just kind of gray areas  
8 and things, but I just, you know, I -- I -- I  
9 always erred on the side of caution on those  
10 things and I don't think he necessarily does.  
11 I'll just put it that way.

12           Q     Okay. Do -- do you have any specific  
13 recollections about those sorts of things, that --  
14 costs you might have eaten that -- that you think  
15 the congressman considered official, but -- but  
16 you weren't comfortable with?

17           A     Yeah. I mean, I can say I just -- the  
18 one thing that always came to my mind was that the  
19 Wardensville garden market, this would have been  
20 -- it's been a while ago. It was probably -- I  
21 don't know whether it was in 2020 or 20 -- it's  
22 probably in 2019, maybe. I'm not even remembering

1 when, but it was just -- he bought several items  
2 that clearly were for -- I thought for family use  
3 and I just wasn't comfortable putting them on my  
4 expense report, you know. I can't say I --

5 Q Okay. So -- so you were at -- you were  
6 at a grocery store and -- and you had purchased  
7 them on your card, but he was taking them --

8 A Yeah, it was actually a --

9 Q -- taking them home?

10 A -- a garden market kind of sort of a  
11 thing where they grew there things and they made  
12 -- it was like a bakery and, you know, that type  
13 of thing and -- and it was a good stop for him to  
14 make him say hello to folks and -- and you know,  
15 the -- the congressman I mean, you know, the  
16 initial report talked about him going to lunch and  
17 shaking hands and then claiming that as a campaign  
18 expense and -- and, you know, I've seen him do  
19 that as far as lunches and stuff.

20 But I've also stopped at the other  
21 places spur of the moment. We'll be going  
22 somewhere else and, Hey, let's stop here for a



1 second. I want to say hi to folks. And I think  
2 he generally enjoys sort of the impromptu visits  
3 and likes to -- to get out and sort of take  
4 people's temperature as to what's going on and  
5 it's, you know, it's not just to write-off for  
6 lunch, you know, it's actually, you know, he  
7 legitimately likes to hear from folks and just  
8 everyday folks. Somebody has to call the office  
9 or have a -- have a need, so somebody that's a  
10 constituent, Hey, I'm your congressman.

11 What's going on? You know, that type of  
12 thing. So I've seen him do that on a number of  
13 occasions, so.

14 Q Okay. Just at that -- that line -- the  
15 line gets blurred sometimes between the --

16 A Yeah.

17 Q -- official expenditure and personal  
18 expenditure?

19 A Oh yeah. Absolutely. Absolutely.

20 Q Okay. And then besides any -- I didn't  
21 want to stop you. Was -- were there any other  
22 issues that you had in mind?

1           A     No, not that comes to mind. I mean, you  
2 know, like I say, it's -- at times, I just think  
3 there's a general sort of frustration with  
4 sometimes how -- he can be a little be little  
5 lackadaisical about issues like that and, you  
6 know, that's -- at those concerns before.

7           Q     Actually you know one thing that -- that  
8 has just jogged my -- my memory or something that  
9 we -- that I asked you about we looked into in the  
10 first review was related to a shed that -- that's  
11 at his house that was built with --

12          A     Yeah .

13          Q     -- with campaign money. Do you know  
14 anything about that shed or -- or how that's used?

15          A     No. No.

16          Q     No?

17          A     Yeah.

18          Q     Okay. And then aside from any  
19 particular issues, are there any individual that  
20 you think would be particularly knowledgeable  
21 about the stuff that we talked about today that  
22 you think that we should -- we should talk to?

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

105

1           A     Yeah, I mean, you know, I -- I have  
2 mentioned Rainer's name before, and I hate to  
3 bring him into it, because I know he's an older  
4 gentleman and this is going to -- it -- it'll be  
5 hard -- it's hard on him, you know, just  
6 emotionally, I think, to have to go through  
7 something like this, but obviously he's done a lot  
8 of work for the congressman in the past and has --  
9 has been a friend as well as an employee, you  
10 know, and.

11                 You know, [Current Staffer 1], in the Charleston  
12 office is somebody that's helped the congressman  
13 on occasion with -- with staffing him and stuff,  
14 you know, but other than that, really can't think  
15 of anybody that would be beyond who we've talked  
16 about and everything already so.

17           Q     Okay. Okay and so you think Rainer and  
18 [Current Staffer 1] would be knowledgeable on the issue of --  
19 of personal errands?

20           A     I don't know about [Current Staffer 1] so much in the  
21 personal side of things, you know, but just  
22 knowing that [Current Staffer 1] has been with the congressman

1 on several occasions, he may be somebody that can  
2 offer some insight.

3 MR. QUINN: Okay. Then I think with  
4 that, I'm sorry that we went longer than we  
5 originally anticipated, but I think with that,  
6 that's all the questions that I have.

7 THE WITNESS: Okay.

8 MR. QUINN: Unless, Annie, are you --  
9 Annie, are you thinking of anything else that I  
10 might have missed and that we should talk about?

11 MS. CHO: I think you covered it all.

12 MR. QUINN: Okay. Great. Well then,  
13 I'll reiterate. Thank you very much for -- for  
14 your time. I'm sure you're busy and so we really  
15 appreciate you taking the time to answer our  
16 questions and I think we we'll be out of your hair  
17 now. So if -- if you don't have anything else for  
18 me or any questions, then we can go ahead and go  
19 off the record.

20 THE WITNESS: Yeah. Not -- not at this  
21 moment, Sean. I appreciate it. Thanks for your  
22 -- I know you're doing your job and being a

Transcript of Interview of Current Staffer 2  
Conducted on October 1, 2021

107

1 professional but I also appreciate that.

2 MR. QUINN: Okay. Great. Thank you  
3 very much, Current Staffer 2. Kevin, we can go ahead and go off  
4 the record.

5 THE REPORTER: Off the record 12:03 p.m.

6 (Off the record at 12:03 p.m.)  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

1 CERTIFICATE OF COURT REPORTER - NOTARY PUBLIC

2 I, KEVIN KISER, the officer  
3 before whom the foregoing deposition was taken, do  
4 hereby certify that said proceedings were  
5 electronically recorded by me; and that I am  
6 neither counsel for, related to, nor employed by  
7 any of the parties to this case and have no  
8 interest, financial or otherwise, in its outcome.

9 IN WITNESS WHEREOF, I have hereunto set  
10 my hand and affixed my notarial seal this 8th day  
11 of October, 2021.

12

13

14 Notary Registration No.: 7637508

15 My Commission Expires: 9/30/2024

16

17

18



19 KEVIN KISER, NOTARY PUBLIC,

20 FOR THE COMMONWEALTH OF VIRGINIA

21

22

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22

CERTIFICATION OF TRANSCRIPT

I, Andrew Hatziyannis, do hereby certify that the foregoing transcript, to the best of my ability, knowledge, and belief, is a true and correct record of the proceedings; that said proceedings were reduced to typewriting under my supervision; and that I am neither counsel for, related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.



---

Andrew Hatziyannis  
Planet Depos, LLC  
October 8, 2021





CONFIDENTIAL

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

ERRATA SHEET

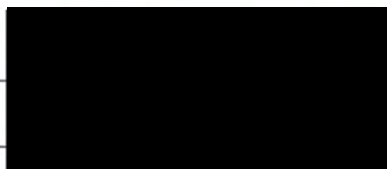
Page	Line	Correction	Reason
54	1	congressman's not congresswoman	incorrect
56	9	Martinsburg	incorrect
58	9	Mansell not Mansdowne	incorrect
64	4	add "each direction"	to clarify
69	12	Johnson not Livingston	incorrect
71	6	Lynn not Lauren	incorrect
75	13	process not protest	incorrect
78	1	sentence not clear	not sure what was being said
79	16	anything not everything	incorrect
82	4	member not matter	incorrect
83	5	pulpit not pump	incorrect
83	11	Lynn, [redacted] not Glen Chick	incorrect
84	19	a not at	incorrect
88	5/6	delete "I was planning to be"	not sure what was being said
88	14	spiset not speak	incorrect
92	13	to not the	incorrect

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:

Witness Signature:

Date:



11-19-21

CONFIDENTIAL

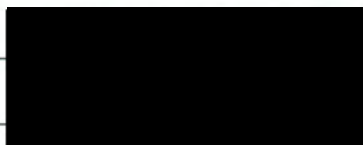
Subject to the Nondisclosure Provisions of H. Res. 895 of the 110th Congress as Amended

ERRATA SHEET

Page	Line	Correction	Reason
<del>94</del>			
93	22	opposite not idea	incorrect
97	15	chuck not Carl	incorrect
98	13	de Caro not Takara	in correct
101	19	Wardensville not Warden's seed	incorrect
102	13	step not stuff	incorrect
102	17	shaking not your	incorrect
102	20	he has not I've	incorrect
104	3	sense not sent	incorrect
104	11	built not filled	incorrect

This errata sheet is submitted subject to 18 U.S.C. § 1001 (commonly known as the False Statements Act).

Witness Name:



Witness Signature:

Date:

11-19-21